PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

GP-Gypsum Corporation
484 East County Road, 1400 North
Wheatfield, Indiana 46392

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T073-12597-00031	
Issued by: Original Signed by Janet McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: April 25, 2002 Expiration Date: April 25, 2007

TABLE OF CONTENTS

TABLE OF CONTENTS (Continued)

TABLE OF CONTENTS (Continued)

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary source that manufactures wallboard.

Responsible Official:	Curt Riggen
Source Address:	484 East County Road, 1400 North, Wheatfield, IN 46392
Mailing Address:	484 East County Road, 1400 North, Wheatfield, IN 46392
SIC Code:	3275
County Location:	Jasper
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) raw materials truck dumping station, identified as emission unit 0201 and installed in 1999.

(b) One (1) FGD storage bin, identified as emission unit 0301, installed in 1999, with a maximum capacity of 300 tons.

(c) One (1) reclaim storage bin, identified as emission unit 0302, installed in 1999, with a maximum capacity of 100 tons, using integral baghouse BSR1as control and exhausting indoors.

(d) Two (2) biogrinders, identified as emission unit 0303, installed in 1999, with a maximum throughput of 131,400 tons/yr, using integral baghouse BRC1 and exhausting indoors.

(e) One (1) FGD storage building, identified as emission unit 0304, installed in 1999, with a maximum capacity of 50,000 tons of FGD and other gypsum materials.

(f) FGD Conveyors from NIPSCO, identified as emission unit 0305, installed in 1999, with a maximum throughput of 723,000 tons/yr including:

(1) FGD conveyors from NIPSCO to the FGD building

(2) FGD bin infeed conveyors

(3) FGD steele feeder belt and sandwich belt conveyor

(g) Reclaim conveyors from the steele feeder to the reclaim bin, identified as emission unit 0306, installed in 1999, with a maximum throughput of 131,400 tons/yr using integral baghouse BRC1 as control and exhausting indoors.

(h) One (1) FGD bin discharge belt conveyor, identified as emission unit 0307, installed in 1999, with a maximum throughput of 723,000 tons/yr using integral baghouse BST1 and

BST2 as control of the transfer point from the reclaim bin discharge belt conveyor to this unit.

(i) One (1) reclaim bin discharge belt conveyor, identified as emission unit 0308, installed in 1999, with a maximum throughput of 131,400 tons/yr, using integral baghouse BST1 or BST2 as control and exhausting indoors.

(j) One (1) landplaster kettle feed bin, identified as emission unit 0501, installed in 1999, with a maximum capacity of 315,360 tons/yr, using integral baghouse BLB1 as control and exhausting indoors.

(k) One (1) landplaster kettle feed bin, identified as emission unit 0502, installed in 1999, with a maximum capacity of 315,360 tons/yr, using integral baghouse BLB2 as control and exhausting indoors.

(l) One (1) totally enclosed landplaster bin with feeder, identified as emission unit 0601, installed in 1999, with a maximum capacity of 5 tons using integral baghouse BLB2 for control and exhausting indoors.

(m) One (1) totally enclosed volumetric feeder lignosulfate, identified as emission unit 0602, installed in 1999, with a maximum capacity of 5 cubic feet.

(n) Four (4) totally enclosed ball mills, identified as emission units 0603-0606, installed in 1999, each with a maximum throughput of 300 lbs/hr.

(o) One (1) ball mill accelerator pneumatic system, identified as emission unit 0607, installed in 1999, with a maximum capacity of 5,256 tons per year, using integral baghouse BBM1 as control and exhausting indoors.

(p) One (1) Kason Sifter, identified as emission unit 0608, installed in 2000, with a maximum capacity of 5,256 tons pers year, using integral baghouse BLB2 for control and exhausting indoors. (Note that this unit is exempt per E 073-14500-00031, issued August 28, 2001).

(q) Two (2) kettle heaters, identified as emission unit 0701, installed in 1999, with a maximum heat input rate of 20 MMBTU/hr and exhausting to stack SCS1.

(r) Two (2) kettle heaters, identified as emission unit 0702, installed in 1999, with a maximum heat input rate of 20 MMBTU/hr and exhausting to stack SCS2.

(s) Two (2) stucco recirculating bucket elevators, identified as emission unit 0801, installed in 1999, with a maximum throughput of 876,000 tons/yr, using integral baghouse BSH1 for control and exhausting to stack SSH1.

(t) One (1) stucco cooling airveyor, identified as emission unit 0802, installed in 1999, with a maximum throughput of 525,600 tons/yr, using integral baghouse BSC1 for control and exhausting to stack SSC1.

(u) One (1) stucco reject storage bin, identified as emission unit 0803, installed in 1999, with a maximum capacity of 5 tons, using integral baghouse BSH1 for control and exhausting to stack SSH1.

(v) One (1) stucco storage bin, identified as emission unit 0804, installed in 1999, with a maximum capacity of 300 tons, using integral baghouse BSB1 for control and exhausting indoors.

(w) One (1) stucco storage bin, identified as emission unit 0805, installed in 1999, with a maximum capacity of 300 tons, using integral baghouse BSB2 for control and exhausting indoors.

(x) One (1) entoleter, identified as emission unit 0806, installed in 1999, with a maximum throughput of 525,600 tons/yr, using integral baghouse BSH1 for control and exhausting to stack SSH1.

(y) One (1) rotary screen, identified as emission unit 0807, installed in 1999, with a maximum throughput of 525,600 tons/yr, using integral baghouse BSH1 for control and exhausting to stack SSH1.

(z) One (1) pneumatic transfer of reject stucco, identified as emission unit 0808, installed in 1999, with a maximum throughput of 219,000 tons/yr, using integral baghouse BSP1 for control and exhausting indoors.

(aa) One (1) 18" screw conveyor (/hot pit collection), identified as emission unit 0809, installed in 1999, with a maximum throughput of 525,600 tons/yr, using integral baghouse BSH1 for control and exhausting to stack SSH1.

(bb) One (1) 18" screw conveyor (weigh belt scalping), identified as emission unit 0810, installed in 1999, with a maximum throughput of 525,600 tons/yr, using integral baghouse BSH1 for control and exhausting to stack SSH1.

(cc) Two (2) 24" screw conveyors (stucco transfer), identified as emission unit 0811, installed in 1999, with a maximum throughput of 876,000 tons/yr per conveyor, using integral baghouse BSH1 for control and exhausting to stack SSH1.

(dd) Two (2) 24" screw conveyors (stucco transfer), identified as emission unit 0812, installed in 1999 with, a maximum throughput of 876,000 tons/yr per conveyor, using integral baghouse BSH1 for control and exhausting to stack SSH1.

(ee) One (1) 12" screw conveyor (reject stucco & paper), identified as emission unit 0813, installed in 1999, with a maximum throughput of 219,000 tons/yr, using integral baghouse BSH1 for control and exhausting to stack SSH1.

(ff) One (1) 9" screw conveyor (return stucco dust), identified as emission unit 0814, installed in 1999, with a maximum throughput of 43,000 tons/yr, using integral baghouse BSH1 for control and exhausting to stack SSH1.

(gg) One (1) reject stucco bucket elevator, identified as emission unit 0815, installed in 1999, with a maximum throughput of 525,600 tons/yr, using integral baghouse BSH1 for control and exhausting to stack SSH1.

(hh) One (1) weigh belt feeder (stucco supply), identified as emission unit 0816, installed in 1999, with a maximum throughput of 525,600 tons/yr, using integral baghouse BSH1 for control and exhausting to stack SSH1.

(ii) One (1) pin mixer, identified as emission unit 0817, installed in 1999, with a maximum production of 250,000 lbs of wet board/hr, using integral baghouse BSH1 for control and exhausting to stack SSH1.

(jj) Seven (7) dry additive bins , identified as emission units 0901-0907, installed in 1999, each with a maximum capacity of 300 tons.

(kk) One (1) pneumatic transfer from truck, identified as emission unit 0908, installed in 1999, with a maximum capacity of 20,000 tons/year, using integral baghouse BAS1 for control and exhausting to stack SAS1.

(ll) One (1) starch storage bin, identified as emission unit 0909, installed in 1999, with a maximum capacity of 40 tons, using integral baghouse BAS1 for control and exhausting to stack SAS1.

(mm) One (1) additives coating belt, identified as emission unit 0910, installed in 1999, with a maximum throughput of 21,840 tons/yr, using integral baghouse BAS2 for control and exhausting indoors.

(nn) Eight (8) direct flame burners, identified as emission unit 1001, installed in 1999, with a total heat input rate of 20 MMBTU/hr and exhausting indoors.

(oo) One (1) end trim system including, 2 pre-cut saws, 2 bundlers with end trim saw, a riser saw and a re-cut saw, identified as emission unit 1002, installed in 1999, with a maximum throughput of 8,650 tons/yr of end trim, using integral baghouse BST1 or BST2 for control and exhausting indoors.

(pp) One (1) wet end seal, identified as emission unit 1003, installed in 1999, with a maximum throughput of 701,588 MSF/yr and exhausting to stack SBF5.

(qq) One (1) board forming dryer zone one, identified as emission unit 1004, installed in 1999, with a maximum heat input rate of 50 MMBTU/hr and exhausting to stack SBF1.

(rr) One (1) board forming dryer zone two, identified as emission unit 1005, installed in 1999, with a maximum heat input rate of 40 MMBTU/hr and exhausting to stack SBF2.

(ss) One (1) board forming dryer zone three, identified as emission unit 1006, installed in 1999, with a maximum heat input rate of 30 MMBTU/hr and exhausting to stack SBF3.

(tt) One (1) dry end seal, identified as emission unit 1007, installed in 1999, with a maximum throughput of 701,588 MSF/yr and exhausting to stack SBF4.

(uu) One (1) cage mill flash drying system, identified as emission unit 0401, installed in 1999, with a maximum production of 144,000 pounds of landplaster per hour, using integral baghouse BCM1as control and exhausting to stack SCM1.

(vv) One (1) cage mill flash dryer air heater, identified as emission unit 0402, installed in 1999, with a maximum heat input rate of 40 MMBTU/hr and exhausting to stack SCM1.

(ww) One (1) kettle/hot pit, identified as emission unit 0703, installed in 1999, with a maximum production of 60,000 lbs of stucco/hr, using integral baghouse BCS1 for control and exhausting to stack SCS3.

(xx) One (1) kettle/hot pit, identified as emission unit 0704, installed in 1999, with a maximum production of 60,000 lbs of stucco/hr, using integral baghouse BCS2 for control and exhausting to stack SCS4.

(yy) One (1) cold cleaner degreaser, identified as emission unit 1101 and installed in 1999.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source does not currently have any specifically regulated insignificant activities, as defined in 326 IAC 2-7-1(21).

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.

(c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the

shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper

maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Records of Preventive Maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the

permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are

explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy any records that must be kept under the conditions of this permit;

(c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds of particulate matter per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment is are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is

at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.12 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

(a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less often than once an hour until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(b) Whenever a condition in this permit requires the measurement of a temperature, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on November 30, 1999.

(b) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(c) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP);

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.17 Compliance Response Plan - Preparation, Implementation, Records and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall constitute a violation of the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other

means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years and end on the last calendar days of March, June, September, and December, respectively.

Stratospheric Ozone Protection

C.22 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(a) One (1) raw materials truck dumping station, identified as emission unit 0201 and installed in 1999.

(b) One (1) FGD storage bin, identified as emission unit 0301, installed in 1999, with a maximum capacity of 300 tons.

(c) One (1) reclaim storage bin, identified as emission unit 0302, installed in 1999, with a maximum capacity of 100 tons, using integral baghouse BSR1as control and exhausting indoors.

(d) Two (2) biogrinders, identified as emission unit 0303, installed in 1999, with a maximum throughput of 131,400 tons/yr, using integral baghouse BRC1 and exhausting indoors.

(e) One (1) FGD storage building, identified as emission unit 0304, installed in 1999, with a maximum capacity of 50,000 tons of FGD and other gypsum materials.

(f) FGD Conveyors from NIPSCO, identified as emission unit 0305, installed in 1999, with a maximum throughput of 723,000 tons/yr including:
  (1) FGD conveyors from NIPSCO to the FGD building
  (2) FGD bin infeed conveyors
  (3) FGD steele feeder belt and sandwich belt conveyor

(g) Reclaim conveyors from the steele feeder to the reclaim bin, identified as emission unit 0306, installed in 1999, with a maximum throughput of 131,400 tons/yr using integral baghouse BRC1 as control and exhausting indoors.

(h) One (1) FGD bin discharge belt conveyor, identified as emission unit 0307, installed in 1999, with a maximum throughput of 723,000 tons/yr using integral baghouse BST1 and BST2 as control of the transfer point from the reclaim bin discharge belt conveyor to this unit.

(i) One (1) reclaim bin discharge belt conveyor, identified as emission unit 0308, installed in 1999, with a maximum throughput of 131,400 tons/yr, using integral baghouse BST1 or BST2 as control and exhausting indoors.

(j) One (1) landplaster kettle feed bin, identified as emission unit 0501, installed in 1999, with a maximum capacity of 315,360 tons/yr, using integral baghouse BLB1 as control and exhausting indoors.

(k) One (1) landplaster kettle feed bin, identified as emission unit 0502, installed in 1999, with a maximum capacity of 315,360 tons/yr, using integral baghouse BLB2 as control and exhausting indoors.

(l) One (1) totally enclosed landplaster bin with feeder, identified as emission unit 0601, installed in 1999, with a maximum capacity of 5 tons using integral baghouse BLB2 for control and exhausting indoors.

(m) One (1) totally enclosed volumetric feeder lignosulfate, identified as emission unit 0602, installed in 1999, with a maximum capacity of 5 cubic feet.

(n) Four (4) totally enclosed ball mills, identified as emission units 0603-0606, installed in 1999, each with a maximum throughput of 300 lbs/hr.

(o) One (1) ball mill accelerator pneumatic system, identified as emission unit 0607, installed in 1999, with a maximum capacity of 5,256 tons per year, using integral baghouse BBM1 as control and exhausting indoors.

(p) One (1) Kason Sifter, identified as emission unit 0608, installed in 2000, with a maximum capacity of 5,256 tons pers year, using integral baghouse BLB2 for control and exhausting indoors. (Note that this unit is exempt per E 073-14500-00031, issued August 28, 2001).

(q) Two (2) kettle heaters, identified as emission unit 0701, installed in 1999, with a maximum heat input rate of 20 MMBTU/hr and exhausting to stack SCS1.

(r) Two (2) kettle heaters, identified as emission unit 0702, installed in 1999, with a maximum heat input rate of 20 MMBTU/hr and exhausting to stack SCS2.

Facility Description [326 IAC 2-7-5(15)]: (Continued)

(s) Two (2) stucco recirculating bucket elevators, identified as emission unit 0801, installed in 1999, with a maximum throughput of 876,000 tons/yr, using integral baghouse BSH1 for control and exhausting to stack SSH1.

(t) One (1) stucco cooling airveyor, identified as emission unit 0802, installed in 1999, with a maximum throughput of 525,600 tons/yr, using integral baghouse BSC1 for control and exhausting to stack SSC1.

(u) One (1) stucco reject storage bin, identified as emission unit 0803, installed in 1999, with a maximum capacity of 5 tons, using integral baghouse BSH1 for control and exhausting to stack SSH1.

(v) One (1) stucco storage bin, identified as emission unit 0804, installed in 1999, with a maximum capacity of 300 tons, using integral baghouse BSB1 for control and exhausting indoors.

(w) One (1) stucco storage bin, identified as emission unit 0805, installed in 1999, with a maximum capacity of 300 tons, using integral baghouse BSB2 for control and exhausting indoors.

(x) One (1) entoleter, identified as emission unit 0806, installed in 1999, with a maximum throughput of 525,600 tons/yr, using integral baghouse BSH1 for control and exhausting to stack SSH1.

(y) One (1) rotary screen, identified as emission unit 0807, installed in 1999, with a maximum throughput of 525,600 tons/yr, using integral baghouse BSH1 for control and exhausting to stack SSH1.

(z) One (1) pneumatic transfer of reject stucco, identified as emission unit 0808, installed in 1999, with a maximum throughput of 219,000 tons/yr, using integral baghouse BSP1 for control and exhausting indoors.

(aa) One (1) 18" screw conveyor (hot pit collection), identified as emission unit 0809, installed in 1999, with a maximum throughput of 525,600 tons/yr, using integral baghouse BSH1 for control and exhausting to stack SSH1.

(bb) One (1) 18" screw conveyor (weigh belt scalping), identified as emission unit 0810, installed in 1999, with a maximum throughput of 525,600 tons/yr, using integral baghouse BSH1 for control and exhausting to stack SSH1.

(cc) Two (2) 24" screw conveyors (stucco collection), identified as emission unit 0811, installed in 1999, with a maximum throughput of 876,000 tons/yr per conveyor, using integral baghouse BSH1 for control and exhausting to stack SSH1.

(dd) Two (2) 24" screw conveyors (stucco transfer), identified as emission unit 0812, installed in 1999 with, a maximum throughput of 876,000 tons/yr per conveyor, using integral baghouse BSH1 for control and exhausting to stack SSH1.

(ee) One (1) 12" screw conveyor (reject stucco & paper), identified as emission unit 0813, installed in 1999, with a maximum throughput of 219,000 tons/yr, using integral baghouse BSH1 for control and exhausting to stack SSH1.

(ff) One (1) 9" screw conveyor (return stucco dust), identified as emission unit 0814, installed in 1999, with a maximum throughput of 43,000 tons/yr, using integral baghouse BSH1 for control and exhausting to stack SSH1.

(gg) One (1) reject stucco bucket elevator, identified as emission unit 0815, installed in 1999, with a maximum throughput of 525,600 tons/yr, using integral baghouse BSH1 for control and exhausting to stack SSH1.

(hh) One (1) weigh belt feeder (stucco supply), identified as emission unit 0816, installed in 1999, with a maximum throughput of 525,600 tons/yr, using integral baghouse BSH1 for control and exhausting to stack SSH1.

(ii) One (1) pin mixer, identified as emission unit 0817, installed in 1999, with a maximum production of 250,000 lbs of wet board/hr, using integral baghouse BSH1 for control and exhausting to stack SSH1.

Facility Description [326 IAC 2-7-5(15)]: (Continued)

(jj) Seven (7) dry additive bins , identified as emission units 0901-0907, installed in 1999, each with a maximum capacity of 300 tons.

(kk) One (1) pneumatic transfer from truck, identified as emission unit 0908, installed in 1999, with a maximum capacity of 20,000 tons/year, using integral baghouse BAS1 for control and exhausting to stack SAS1.

(ll) One (1) starch storage bin, identified as emission unit 0909, installed in 1999, with a maximum capacity of 40 tons, using integral baghouse BAS1 for control and exhausting to stack SAS1.

(mm) One (1) additives coating belt, identified as emission unit 0910, installed in 1999, with a maximum throughput of 21,840 tons/yr, using baghouse BAS2 for control and exhausting indoors.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter (PM) [40 CFR Part 60, Subpart OOO]

Pursuant to the New Source Performance Standards, 326 IAC 12 and 40 CFR 60.670 through 60.676, Subpart OOO (Standards of Performance for Nonmetallic Mineral Processing Plants):

(a) The crushing operations (emission unit 0303) shall be limited to 15 percent opacity or less, and

(b) The screening and conveying operations (emission units 0301-0308, 0501, 0502, 0601, 0603-0606, 0608, 0801, 0803-0807, 0815, 0816, 0902, 0907, 0909, 0910) shall be limited to 10 percent opacity or less.

(c) The emission vents from buildings that enclose emission units subject to this condition shall be limited to 7% opacity and 0.02 grains per dry standard cubic foot (gr/dscf); equivalent to 0.05 grams per dry standard cubic meter (g/dscm).

Compliance with these opacity limits shall also satisfy the requirements of 326 IAC 5-1.

D.1.2 General Provisions [326 IAC 12-1-1] [40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 12-1-1, apply to the facilities described in this section except when otherwise specified in 40 CFR Part 60, Subpart OOO. The permittee shall comply with the requirements of this condition on and after the compliance date for the facilities subject to 40 CFR 60, Subpart OOO.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the following facilities shall not exceed the pound per hour rate established in the table below.

Emission Source	Emission Source ID	Air Pollution Control Device ID	Maximum Throughput (tpy)	Maximum Throughput (lbs/hr)	Maximum Throughput (tons/hr)	Maximum Allowable Emission Rate (lb/hr)
Truck Dumping FGD	0201	NA	300,000	68,493	34	41
Storage Bin	0301	NA	723,000	165,068	83	49
Reclaim Storage Bin	0302	BSR1	131,400	30,000	15	25
Recycle Crushing/Bio	0303	BRC1	131,400	30,000	15	25

Emission Source	Emission Source ID	Air Pollution Control Device ID	Maximum Throughput (tpy)	Maximum Throughput (lbs/hr)	Maximum Throughput (tons/hr)	Maximum Allowable Emission Rate (lb/hr)
Grinder						
FGD Storage Building	0304	NA	723,000	165,068	83	49
FGD Conveyors from NIPSCO	0305	NA	723,000	165,068	83	49
Reclaim Bin Infeed Conveyors	0306	BRC1	131,400	30,000	15	25
FGD Bin Discharge Conveyor	0307	BST1 or BST2	723,000	165,068	83	49
Reclaim Bin Discharge Conveyors	0308	BST1 or BST2	131,400	30,000	15	25
Kettle Feed Landplaster Bins #1	0501	BLB1	315,360	72,000	36	42
Kettle Feed Landplaster Bins #2	0502	BLB2	315,360	72,000	36	42
Landplaster Bin with Feeder	0601	BLB2	5,256	1,200	1	3
Volumetric Feeder Lignosulfate	0602	NA	7,096	1,620	1	4
Ball Mill #1	0603	NA	1,314	300	0.15	1
Ball Mill #2	0604	NA	1,314	300	0.15	1
Ball Mill #3	0605	NA	1,314	300	0.15	1
Ball Mill #4	0606	NA	1,314	300	0.15	1
Ball Mill Accelerator Pneumatic System	0607	BBM1	5,256	1,200	0.6	3
Kason Sifter	0608	BLB2	5,256	1,200	0.6	3
Stucco Recirculating Bucket Elevators	0801	BSH1	876,000	200,000	100	51
Stucco Cooling Airveyor	0802	BSC1	525,600	120,000	60	46
Stucco Reject Storage Bin	0803	BSH1	219,000	50,000	25	35
Stucco Storage Bin #1	0804	BSB1	876,000	200,000	100	51
Stucco Storage Bin #2	0805	BSB2	876,000	200,000	100	51
Entoleter	0806	BSH1	525,600	120,000	60	46
Rotary Screen	0807	BSH1	525,600	120,000	60	46
Pneumatic Transfer of Reject Stucco	0808	BSP1	219,000	50,000	25	35
18" Screw Conveyor, Hot Pit Collector	0809	BSH1	525,600	120,000	60	46
18" Screw Conveyor, Weigh Belt Scalping	0810	BSH1	525,600	120,000	60	46
2 24" Screw Conveyors, Stucco Collection	0811	BSH1	1,752,000	400,000	200	59
2 24" Screw Conveyors, Stucco Transport	0812	BSH1	1,752,000	400,000	200	59
12" Screw Conveyor, Reject Stucco and Paper	0813	BSH1	219,000	50,000	25	35
9" Screw Conveyor, Return Stucco Dust	0814	BSH1	43,000	9,817	5	12
Reject Stucco Bucket Elevator	0815	BSH1	525,600	120,000	60	46

Emission Source	Emission Source ID	Air Pollution Control Device ID	Maximum Throughput (tpy)	Maximum Throughput (lbs/hr)	Maximum Throughput (tons/hr)	Maximum Allowable Emission Rate (lb/hr)
Weigh Belt Feeder, Stucco Supply	0816	BSH1	525,600	120,000	60	46
Pin Mixer	0817	BSH1	1,095,000	250,000	125	54
Dry Additive Storage Bins	0901-0907	NA	42,805	9,773	5	12
Starch Pneumatic System	0908,0909	BAS1	20,000	4,566	2	7
Additives Collecting Belt	0910	BAS2	21,840	4,986	2	8

The pounds per hour limitations were calculated with the following equations:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

or depending on the process weight rate:

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 55.0\ P^{0.11} - 40$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

Compliance Determination Requirements

D.1.5 Particulate Matter (PM)

In order to comply with Conditions D.1.1 and D.1.3, baghouses BSR1, BRC1, BST1, BST2, BLB1, BLB2, BSH1, BBM1, BSC1, BSB1, BSB2, BSP1, BAS1, and BAS2, including those integral to the process, for PM control shall be in operation and control emissions from facilities 0302, 0303, 0306, 0307, 0308, 0501, 0502, 0601, 0607, 0608, 0801 through 0817, and 0908 through 0910 at all times that these facilities are in operation:

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.6 Visible Emissions Notations

(a) Once per shift visible emission notations of the buildings enclosing the transfer points of fugitive emission sources 0201, 0304, 0305, 0602-0606, and 0901-0907, fugitive emission source 0301, and of the exhaust from stacks SCS1, SCS2, SAS1, SSH1, and SSC1 shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.1.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the facilities listed in Condition D.1.5, at least once per shift when these facilities are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.5 and 6.5 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.8 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the wallboard manufacturing operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.1.9 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.10 Record Keeping Requirements

(a) To document compliance with Condition D.1.6, the Permittee shall maintain records of once per shift visible emission notations of the buildings enclosing fugitive emission sources 201, 301, 304, 305, 0602-0606, 901-907, and of the stack exhaust from stacks SCS1, SCS2, SAS1, SSH1, and SSC1.

(b) To document compliance with Condition D.1.7, the Permittee shall maintain the following:

(1) Once per shift records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle operation.

(2) Documentation of the dates vents are redirected.

(c) To document compliance with Condition D.1.8, the permittee shall maintain records of the results of inspections required under D.1.8 and the dates the vents are redirected.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(nn) Eight (8) direct flame burners, identified as emission unit 1001, installed in 1999, with a total heat input rate of 20 MMBTU/hr and exhausting indoors.

(oo) One (1) end trim system including, 2 pre-cut saws, 2 bundlers with end trim saw, a riser saw and a re-cut saw, identified as emission unit 1002, installed in 1999, with a maximum throughput of 8,650 tons/yr of end trim, using integral baghouse BST1 or BST2 for control and exhausting indoors.

(pp) One (1) wet end seal, identified as emission unit 1003, installed in 1999, with a maximum throughput of 701,588 MSF/yr and exhausting to stack SBF5.

(qq) One (1) board forming dryer zone one, identified as emission unit 1004, installed in 1999, with a maximum heat input rate of 50 MMBTU/hr and exhausting to stack SBF1.

(rr) One (1) board forming dryer zone two, identified as emission unit 1005, installed in 1999, with a maximum heat input rate of 40 MMBTU/hr and exhausting to stack SBF2.

(ss) One (1) board forming dryer zone three, identified as emission unit 1006, installed in 1999, with a maximum heat input rate of 30 MMBTU/hr and exhausting to stack SBF3.

(tt) One (1) dry end seal, identified as emission unit 1007, installed in 1999, with a maximum throughput of 701,588 MSF/yr and exhausting to stack SBF4.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations):

(a) The allowable PM emission rate from the end trim system shall not exceed 47.4 pounds per hour when operating at a process weight rate of 67.5 tons per hour.

(b) The allowable PM emission rate from the wet and dry end seals and the board forming dryer, zones 1 through 3, shall not exceed 53.5 lb/hr when operating at a process weight rate of 125 tons per hour.

The pounds per hour limitations were calculated using the following equation:

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 55.0\ P^{0.11} - 40$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

D.2.2 VOC Emission Limitation

Pursuant to CP-073-9573-00031 and 326 IAC 8-1-6 (New Facilities General Reduction Requirements), volatile organic compound (VOC) emissions from the wallboard dryer (drying zones 1-3, and seal operations) shall have the following limitations:

(a) When producing non-DENS wallboard, VOC emissions shall not exceed 0.19 lbs VOC per 1000 ft^2 board,

(b) When producing DENS wallboard, production is limited to 168,000 MSF (1000 ft^2) per 12 consecutive month period and VOC emissions shall not exceed 0.35 lbs VOC per 1000 ft^2 board. This production limit is equivalent to a VOC emission limit 29.40 tons per 12 consecutive month period from the wallboard dryer (drying zones 1-3, and seal operations).

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for facility 1002, baghouses BST1 and BST2, and facilities 1001, 1003, 1004, 1005, 1006, and 1007.

Compliance Determination Requirements

D.2.4 Particulate Matter (PM)

In order to comply with condition D.2.1, the baghouses, including those determined to be integral, for PM control shall be in operation and control emissions from the end trim system at all times that the end trim system is in operation.

D.2.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and emission limitations contained in Condition D.2.2 shall be determined from material balance calculations based on the quality and composition of the additives use in the wallboard production process rolled on a 12 month average.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.6 Visible Emissions Notations

(a) Visible emission notations of the stack exhaust from stacks SBF1-SBF5 shall be performed once per shift, during DENS production, during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.2.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the end trim system, at least once per shift when the end trim system is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.5 and 6.5 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance

with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.2.8 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the end trim system when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.2.9 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.10 Record Keeping Requirements

(a) To document compliance with Condition D.2.2, the Permittee shall maintain records of the amount of VOC per 1000 square feet of board for both non-DENS and DENS wallboard production and the amount of DENS wallboard produced. The material balance calculations, based on the quantity and composition of the additives used, performed to calculate the VOC usage shall also be included in these records.

(b) To document compliance with Condition D.2.6, the Permittee shall maintain records of visible emission notations of the stack exhaust from stack SBF1 - SBF5 once per shift during DENS production.

(c) To document compliance with Condition D.2.7, the Permittee shall maintain the following:

(1) Once per shift records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle operation.

(2) Documentation of the dates vents are redirected.

(d) To document compliance with Condition D.2.8, the Permittee shall maintain records of the results of the inspections required under Condition D.2.8 and the dates the vents are redirected.

(e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The reports submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(uu) One (1) cage mill flash drying system, identified as emission unit 0401, installed in 1999, with a maximum production of 144,000 pounds of landplaster per hour, using integral baghouse BCM1 as control and exhausting to stack SCM1.

(vv) One (1) cage mill flash dryer air heater, identified as emission unit 0402, installed in 1999, with a maximum heat input rate of 40 MMBTU/hr and exhausting to stack SCM1.

(ww) One (1) kettle/hot pit, identified as emission unit 0703, installed in 1999, with a maximum production of 60,000 lbs of stucco/hr, using integral baghouse BCS1 for control and exhausting to stack SCS3.

(xx) One (1) kettle/hot pit, identified as emission unit 0704, installed in 1999, with a maximum production of 60,000 lbs of stucco/hr, using integral baghouse BCS2 for control and exhausting to stack SCS4.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [40 CFR Part 60, Subpart UUU]

Pursuant to the New Source Performance Standards, 326 IAC 12 and 40 CFR 60.730 through 60.737, Subpart UUU (Standards of Performance for Calciners and Dryers in Mineral Industries), the particulate emissions from the calcining kettles (emission units 0703 and 0704), and the cage mill flash dryer (emission unit 0401) shall be limited as follows:

(a) 10% opacity or less

(b) 0.04 gr/dscf

D.3.2 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 60, Subpart UUU.

D.3.3 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from:

(a) The cage mill flash dryer shall not exceed 48 lbs/hr when operating at a maximum capacity flow rate of 144,000 lbs/hr.

(b) The kettle/hot pits shall not exceed 40 lbs/hr each when operating at a maximum capacity flow rate of 60,000 lbs/hr.

The pound per hour limitations were calculated using one of the following equations:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

or depending on the process weight rate:

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 55.0\ P^{0.11} - 40$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

D.3.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

Compliance Determination Requirements

D.3.5 Particulate Matter (PM)

In order to comply with Conditions D.3.1 and D.3.3, the baghouses, including those determined to be integral, for PM control shall be in operation and control emissions from the cage mill flash dryer and kettle/hot pits at all times that the cage mill flash dryer and kettle/hot pits are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.6 Visible Emissions Notations

(a) Visible emission notations of the stack exhaust from stacks SCM1, SCS3, and SCS4 shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.3.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the cage mill flash dryer and kettle/hot pits (BCM1, BCS1, and BCS2), at least once per shift when the facilities are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.5 and 6.5 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit. .

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.3.8 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the cage mill flash dryer when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.3.9 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.10 Record Keeping Requirements

(a) To document compliance with Condition D.3.6, the Permittee shall maintain records of visible emission notations of the stack exhaust from stacks SCM1, SCS3, and SCS4 once per shift.

(b) To document compliance with Condition D.3.7, the Permittee shall maintain the following:

(1) Once per shift records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle operation.

(2) Documentation of the dates vents are redirected.

(c) To document compliance with Condition D.3.8, the Permittee shall maintain records of the results of the inspections required under Condition D.3.8 and the dates the vents are redirected.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(yy) One (1) cold cleaner degreaser, identified as emission unit 1101 and installed in 1999.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for cold cleaning operations constructed after January 1, 1980, the owner or operator shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.4.2 Volatile Organic Compounds (VOC)

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility construction of which commenced after July 1, 1990, shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{O}C) (one hundred twenty degrees Fahrenheit (120^{O}F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: GP-Gypsum Corporation
Source Address: 484 East County Road, 1400 North, Wheatfield, Indiana 46392
Mailing Address: 484 East County Road, 1400 North, Wheatfield, Indiana 46392
Part 70 Permit No.: 073-12597-00031

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: GP-Gypsum Corporation
Source Address: 484 East County Road, 1400 North, Wheatfield, Indiana 46392
Mailing Address: 484 East County Road, 1400 North, Wheatfield, Indiana 46392
Part 70 Permit No.: 073-12597-00031

This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)

- C The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- C The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance Data Section

Part 70 Quarterly Report

Source Name: GP-Gypsum Corporation
Source Address: 484 East County Road, 1400 North, Wheatfield, Indiana 46392
Mailing Address: 484 East County Road, 1400 North, Wheatfield, Indiana 46392
Part 70 Permit No.: 073-12597-00031
Facility: Wallboard dryer
Parameter: VOC for non-DENS production
Limit: 0.19 lbs/1000 ft^2 board

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance Data Section

Part 70 Quarterly Report

Source Name: GP-Gypsum Corporation
Source Address: 484 East County Road, 1400 North, Wheatfield, Indiana 46392
Mailing Address: 484 East County Road, 1400 North, Wheatfield, Indiana 46392
Part 70 Permit No.: 073-12597-00031
Facility: Wallboard dryer
Parameter: DENS production and VOC emission
Limit: 168,000 1000 ft of wallboard 12 consecutive month period and 0.35 lbs VOC/1000 ft^2 board

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance Data Section

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: GP-Gypsum Corporation
Source Address: 484 East County Road, 1400 North, Wheatfield, Indiana 46392
Mailing Address: 484 East County Road, 1400 North, Wheatfield, Indiana 46392
Part 70 Permit No.: 073-12597-00031

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Page 2 of 2

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: ______________________________

Title/Position: ______________________________

Date: ______________________________

Phone: ______________________________

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for a Title V Part 70 Operating Permit

Source Name: G-P Gypsum Corporation
Source Location: 484 East County Road, 1400 North, Wheatfield, IN 46392
County: Jasper
SIC Code: 3275
Operation Permit No.: T 073-12597-00031
Permit Reviewer: ERG/BS

On November 20, 2001, the Office of Air Quality (OAQ) had a notice published in the Rensselear Republican, Rensselear, Indiana, stating that GP Gypsum had applied for a Title V Part 70 Operating Permit to operate a wallboard manufacturing plant. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On December 7, 2001, GP Gypsum submitted comments on the proposed Part 70 permit. The following is a summary of the comments and responses to those comments. The Table Of Contents has been modified, if applicable, to reflect these changes.

Section A

Comment 1:

The feeder discharging from the Kason Sifter uses baghouse BLB2, not baghouse BLB1, for control and exhausts indoors.

Response to Comment 1:

Section A.2 has been modified as follows to clarify that emissions from the Kason Sifter (unit 0608) are controlled by baghouse BLB2:

(p) One (1) Kason Sifter, identified as emission unit 0608, installed in 2000, with a maximum capacity of 5,256 tons pers year, using integral baghouse ~~BLB1~~ **BLB2** for control and exhausting indoors.

Note that this change has been made throughout the permit, as appropriate.

Section D

Comment 2:

Facilities 0501 and 0502 each have a maximum throughput of 36 tons per hour, not 30 tons per hour, which is equivalent to 72,000 pounds per hour, not 69,000 pounds per hour. Facility 0607 has a maximum throughput of 5,256 tons per year, not 2,200 tons per year. The allowable emissions pursuant to 326 IAC 6-3-2 should be adjusted accordingly. Facility 0817 should have a maximum throughput of 1,095,000 tons per year and 250,000 lb/hr.

Response to Comment 2:

Condition D.1.3 has been modified as follows to list the accurate maximum capacities and control devices of the respective facilities (Note that these changes do not modify existing limits as the maximum capacities and specific limits, pursuant to 326 IAC 6-3-2, and were not included in the original construction permit.):

Emission Source	Emission Source ID	Air Pollution Control Device ID	Maximum Throughput (tpy)	Maximum Throughput (lbs/hr)	Maximum Throughput (tons/hr)	Maximum Allowable Emission Rate (lb/hr)
Kettle Feed Landplaster Bins #1	0501	BLB1	315,360	~~69,000~~ **72,000**	~~30~~ **36**	~~40~~ **42**
Kettle Feed Landplaster Bins #2	0502	BLB2	315,360	~~69,000~~ **72,000**	~~30~~ **36**	~~40~~ **42**
Landplaster Bin with Feeder	0601	BLB2	5,256	1,200	1	3
Volumetric Feeder Lignosulfate	0602	NA	7,096	1,620	1	4
Ball Mill #1	0603	NA	1,314	300	0.15	1
Ball Mill #2	0604	NA	1,314	300	0.15	1
Ball Mill #3	0605	NA	1,314	300	0.15	1
Ball Mill #4	0606	NA	1,314	300	0.15	1
Ball Mill Accelerator Pneumatic System	0607	BBM1	~~2,200~~ **5,256**	~~502~~ **1,200**	~~0.15~~ **0.6**	~~2~~ **3**
Kason Sifter	0608	~~NA~~ **BLB2**	5,256	1,200	1	3
Stucco Recirculating Bucket Elevators	0801	BSH1	876,000	200,000	100	51
Stucco Cooling Airveyor	0802	BSC1	525,600	120,000	60	46
Stucco Reject Storage Bin	0803	~~NA~~ **BSH1**	219,000	50,000	25	35
Stucco Storage Bin #1	0804	BSB1	876,000	200,000	100	51
Stucco Storage Bin #2	0805	BSB2	876,000	200,000	100	51
Entoleter	0806	~~NA~~ **BSH1**	525,600	120,000	60	46
Rotary Screen	0807	~~NA~~ **BSH1**	525,600	120,000	60	46
Pneumatic Transfer of Reject Stucco	0808	BSP1	219,000	50,000	25	35
Pin Mixer	0817	BSH1	~~887,388~~ **1,095,000**	~~202,600~~ **250,000**	~~101~~ **125**	~~51~~ **54**

Note that references to these changes have been made throughout the permit, as appropriate.

Comment 3:

Emission unit 0201 (the truck dump) and the transfer point to the FGD transfer conveyor belt (part of EU 0305) are both located outdoors. The transfer point from the truck dump conveyor to the main FGD conveyors from NIPSCO (also part of EU 0305) is enclosed in a building. From the NIPSCO property line to the FGD storage building (EU 0304) the conveyors from NIPSCO are located outdoors with the exception of a single transfer point which is enclosed in the same building as referenced in the previous sentence. Please revise the descriptions to accurately reflect the arrangement of these sources.

Response to Comment 3:

Condition D.1.6 has been modified, as follows, to accurately indicate which transfer points (regulated by 40 CFR Part 60 Subpart OOO) from fugitive sources are enclosed within buildings at the source:

D.1.6 Visible Emissions Notations

(a) Once per shift visible emission notations of the buildings enclosing **the transfer points of** fugitive emission sources **0**201, ~~301,~~ **0**304, **0**305, **and 0**901-**0**907, **fugitive emission source 0301,** and of the exhaust from stacks SCS1, SCS2, SAS1, SSH1, and SSC1 shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

Comment 4:

Conditions D.1.6, D.2.6, D.3.6, D.1.10, D.2.10, D.3.10 – Each of these conditions reference the performance of visible emission notations every shift during normal daylight operational hours for sources vented to the atmosphere and for fugitive sources enclosed in buildings. Although the requirement to make visible emission notations every shift for sources vented to the atmosphere is included in the facility's original construction permit, operational experience since start-up indicates that daily visible emission notations would be more appropriate for the following reasons:

(a) The facility's operations do not materially vary from shift to shift. Because of this consistency, daily notations would be more than adequate to assure compliance. In other words, the additional monitoring value gained by shift-by-shift notations is greatly outweighed by the added compliance burden.

(b) Shift-by-shift visible emission notations also create difficult operating situations during mid shift start-ups or shutdowns. Employees will have difficulty making the rounds taking visible emission notations if only an hour or two of normal operations is available to perform all of the necessary monitoring.

(c) As the seasons change, daylight availability on the off shifts has made shift-by-shift monitoring problematic. During the summer, only about an hour or two of daylight is available (depending on the date and weather) on third shift to complete monitoring. Likewise in the winter, darkness arrives an hour into second shift. If during these short windows of opportunity, an operational issue arises that requires immediate attention of the staff, there is no flexibility to take notations later in the shift.

(d) Similar gypsum wallboard manufacturing operations in the State of Indiana are required only to complete daily visible emission notations. United States Gypsum Corporation's Shoals, Indiana facility whose Title V permit was most recently modified on 11/30/2001 is required to perform daily visible emissions monitoring on fugitive source and stack sources vented to atmosphere. United States Gypsum Corporation's East Chicago, Indiana facility is also required by the facility's Title V permit to perform daily visible emissions notations rather than on a per shift basis.

As many as 19,710 visible emission notations per year would be required for the 18 sources outlined in the proposed permit (or three times the number that G-P Gypsum's direct business competition is required to perform based on their respective permits). Once per day visible emission notations would not only be fair and equitable with respect to the plant's competitors, but would also be sufficient to assure compliance with the terms and conditions of the permit (as outlined in the Appalachian Power [see the attached legal background], court decision) without raising the operational difficulties presented above. Please modify the visible emission notation requirements from shift-by-shift to daily in the conditions reference above and throughout the permit where applicable.

Response to Comment 4:

The OAQ is aware that the frequency of compliance monitoring for visible emission notations contained in previously issued Part 70 and FESOP permits for gypsum wallboard manufacturing operations in Indiana has evolved over time. After much in-house discussion and evaluation the OAQ has concluded that visible emission notations on a per shift basis will better demonstrate continuous compliance with the permit requirements. The National Gypsum FESOP renewal was issued in January 2002 and requires visible emission notations on a per shift basis. The OAQ intends to adjust the monitoring frequency for visible emissions in existing permits for similar sources as future modifications and renewals are issued.

The OAQ believes that visible emissions monitoring on a per shift basis is necessary because baghouse failure can occur suddenly and at any shift. Further, while the nature of a facility's operation may not vary from shift to shift, the personnel at the facility does change from shift to shift. The OAQ believes that all shifts should be in tune with the work practices necessary to ensure continual compliance with permit requirements. The OAQ believes that these work practices should include an understanding and awareness of plant emissions during normal operations. This knowledge and awareness during all shifts can minimize lag time in addressing control failure.

This approach in monitoring frequency is consistent with OAQ's past approach to periodic monitoring. Further, it is not inconsistent with the court decision in Appalachian Power Company, et al v. Environmental Protection Agency, (D.C. Circ. 2000) 208 F.3d 1015. Indiana's Title V rules concerning compliance monitoring are somewhat different than the corresponding federal counterpart. The provisions of 326 IAC 2-7-5(3) state that the Part 70 permits must include: "Monitoring and related record-keeping and reporting requirements which assure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements." Additionally, the language of 326 IAC 2-7-5(3) clearly suggest that existing federal monitoring requirements are considered only as "minimum" permit requirements. Further, the Petitioners in Appalachian Power did not question a state permitting authority to adopt more stringent permit requirements than federal law requires, the Petitioners questioned the EPA's authority to require state permitting authorities, in issuing Title V permits, to make revisions to monitoring requirements in existing federal standards. Id. at p. 1019, n.6, p.1024. The difference in the Indiana Title V rule results in Indiana's ability to institute more stringent compliance monitoring requirements than the "gap-filling" constraints that were set forth by the court in Appalachian Power.

No changes were made to the permit as a result of this comment.

Comment 5:

Conditions D.1.7, D.2.7, D.3.7, D.1.10, D.2.10, D.3.10 – In accordance with operating condition 11 (a) of the G-P Gypsum's construction permit, total static pressure drop readings across the facility's baghouses are taken at least once per week. In light of the Appalachian Power decision, G-P Gypsum requests that the parametric monitoring (D.1.7, D.2.7, and D.3.7), recordkeeping (D.1.10, D.2.10, D.3.10), and any other applicable sections of the draft permit, be modified to require total static pressure drop readings across facility baghouses once per week rather than once per shift. The construction permit specifications require a total of 312 pressure drop observations per year. If the draft compliance monitoring currently proposed in the permit were implemented, the facility would be required to make as many as 6,570 pressure drop observations annually. The imposition of this dramatic increase in periodic monitoring requirements is excessively burdensome and conflicts with the intent of the Title V permitting program not to add new substantive requirements, especially where (as here) adequate periodic monitoring to assure compliance already exists.

Response to Comment 5:

After much in-house discussion and evaluation the OAQ has concluded that total static pressure drop readings across a facility's baghouse should be taken once per shift. Monitoring of the static pressure drop can alert the operator to relative changes (such as dust cake resistance) over a period of time. The operator can use this information to chart trends and determine if the unit is operating within the optimal range as determined by baseline testing of the unit and manufacturer's specifications. Pressure drop is also an indicator of a variety of conditions within the baghouse. Any deviations from the normal operational range of the unit, whether gradual or sudden, should alert the operator that the unit needs maintenance and that damage to the bags or baghouse could result if not properly addressed. The OAQ intends to adjust the monitoring frequency of pressure drop readings in existing permits for similar sources that currently monitor less frequently than a per shift basis as future modifications and renewals are issued.

The OAQ does not consider the total static pressure drop readings across the baghouse to be an additional "substantive requirement" . Pressure drop readings are, instead, a form of parametric compliance monitoring that help ensure continual compliance with the "substantive" particulate matter limits in 326 IAC 6. The OAQ believes that it is well within the intent of Title V to require the type and extent of record keeping and monitoring in the permit that ensures continual compliance with that facility's emission limitations or other applicable requirements.

Please see Response to Comment 4 above concerning the Appalachian Power court case. The requirements to measure the pressure drops across the baghouse once per shift will remain unchanged.

Comment 6:

GP Gypsum requests that Condition D.2.3 be modified to clarify that the end trim system is the facility with a control device that requires a preventative maintenance plan.

Response to Comment 6:

IDEM, OAQ feels that the end trim system (1002), baghouses BST1 and BST2, direct flame burners (1001), wet end seal (1003), board forming dryer zones (1004 - 1006) and dry end seal (1007) are all facilities that should receive preventive maintenance. As a result, Condition D.2.3 has been modified to clearly indicate that a Preventive Maintenance Plan is required for those facilities.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for ~~this facility~~ **facility 1002, baghouses BST1 and BST2, and facilities 1001, 1003, 1004, 1005, 1006, and 1007.**

Comment 7:

Conditions D.2.6 (a), D.2.10 (b) – Please revise these conditions to require visible emission notations of stack exhaust from stacks SBF1-SBF5 on a daily basis during normal daylight operations when producing DENS product and exhausting to the atmosphere. Visible monitoring during non-DENS production is inappropriate since particulate matter emissions are negligible (as documented in the stack test results submitted to Kate Huckelbridge of ERG). Stack emissions from SBF1-SBF5 during non-DENS production are limited to VOCs, water vapor, and by-products of natural gas combustion for which visible emission / opacity notations are not a measure for compliance. Furthermore, compliance monitoring, in the form of VOC recordkeeping, has already been established for the wallboard dryer. Finally, visible emission notations are not required for other natural gas fired wallboard dryers in the State of Indiana.

Response to Comment 7:

IDEM understands that visible emission monitoring during non-DENS production is inappropriate since particulate matter emissions are negligible. As stated in Response to Comment 4, visible emission monitoring on a daily basis is not sufficient to ensure compliance. Therefore, Conditions D.2.6(a) and D.2.10(b) have been revised as follows:

D.2.6 Visible Emissions Notations

(a) Visible emission notations of the stack exhaust from stacks SBF1-SBF5 shall be performed once per shift**, during DENS production,** during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance ~~Monitoring~~**Response** Plan - ~~Failure to take Response Steps,~~ **Preparation, Implementation, Records, and Reports,** shall be considered a violation of this permit.

D.2.10 Record Keeping Requirements

(a) To document compliance with Condition D.2.2, the Permittee shall maintain records of the amount of VOC per 1000 square feet of board for both non-DENS and DENS wallboard production. The material balance calculations, based on the quantity and composition of the additives used, performed to calculate the VOC usage shall also be included in these records.

(b) To document compliance with Condition D.2.6, the Permittee shall maintain records of visible emission notations of the stack exhaust from stacks SBF1 - SBF5 once per shift **during DENS production**.

Comment 8:

CP 073-9573-00031, issued on September 23, 1998, required calibration of the pressure drop measuring devices every twelve months while the draft permit requires calibration every six months. In light of the Appalachian court case ruling mentioned previously, GP Gypsum feels that the calibration requirement in Conditions D.1.7, D.2.7, and D.3.7 should remain an annual requirement.

Response to Comment 8:

As stated in Response to Comment 5, above, the court ruled in *Appalachian Power vs. the EPA*, that if existing applicable requirements already specify compliance monitoring, then a state agency does not have the authority to change or modify those compliance monitoring requirements. However, the pressure drop measuring device calibration requirement from CP 073-9573-00031, issued on September 23, 1998, is not an applicable requirement. Therefore, the ruling of the case does not prevent OAQ from modifying this requirement to ensure compliance.

Upon further review, the OAQ have decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes.

Updates 1 through 5 have been made to incorporate the Article 2 rule revisions that were adopted on October 3, 2001, and become effective on January 19th, 2002. For more information about this rulemaking, refer to the October 2001 Air Pollution Control Board Packet which can be found on the internet at http://www.state.in.us/idem/air/rules/apcb/packets/index.html. The rule revisions will be published in the February 1, 2002 Indiana Register which can be found on the internet at http://www.IN.gov/legislative/register/index-25.html.

1. Add the new rule cite to B.2 Permit Term.

B.2 Permit Term [326 IAC 2-7-5(2)] **[326 IAC 2-1.1-9.5]**

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

2. B.12 Emergency Provisions (a)(b) and (g) have been revised to reflect rule changes to 326 IAC 2-7-16. This section of the rule is now consistent with 40 CFR 70.6(g) and provides an affirmative defense to an action brought for non-compliance with technology based emission limitations only.

B.12 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation~~, except as provided in 326 IAC 2-7-16.~~

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a ~~health-based or~~ technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(g) ~~Operations may continue during an emergency only if the following conditions are met~~:

~~(1)~~ If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

~~(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:~~

~~(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and~~

~~(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.~~

~~Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.~~

3. B.14 Multiple Exceedances has been deleted, because 326 IAC 2-7-5(1)(E) has been repealed, because it conflicted with40 CFR 70.6(a)(6).

~~B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]~~

~~Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.~~

4. B.14 Prior Permits Superseded was added to the permit to help clarify the intent of the new rule 326 IAC 2-1.1-9.5.

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

5. Remove (b) from B.13 Permit Shield. Since B.14 Prior Permit Superceded has been added to the permit, it is not necessary for this statement to be in this condition.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

~~(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.~~

6. The IDEM, OAQ, has revised Condition B.15 Deviations from Permit Requirements and Conditions and certain Parametric Monitoring conditions in the D section of the permit to address concerns regarding the independent enforceability of permit conditions [see 40 CFR 70.6(a)(6)(i)]. The Parametric Monitoring conditions have been revised to establish normal operating conditions for the emission unit or control device and to require implementation of the compliance response plan when monitoring indicates operation is outside the normal range. Language that inferred that operating outside of the normal range could be considered by itself to be a deviation was removed. B.15 was revised to remove language that could be considered to grant exemptions from permit requirements and to clarify reporting obligations.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. ~~Deviations that are required to be reported by an applicable requirement~~ **A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit,** shall be reported according to the schedule stated in the applicable requirement and ~~do~~ **does** not need to be included in this report.

The ~~notification by the Permittee~~ **Quarterly Deviation and Compliance Monitoring Report** does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit ~~or a rule. It does not include:~~

~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~

~~(2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.~~

~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.~~

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

D.1.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the facilities listed in Condition D.1.5, at least once per shift when these facilities are in operation when venting to the atmosphere. ~~Unless operated under conditions for which the Compliance Response Plan specifies otherwise~~ **When for any one reading**, the pressure drop across the baghouse ~~shall be maintained within~~ **is outside** the **normal** range of 0.5 and 6.5 inches of water or a range established during the latest stack test~~. The~~ **, the Permittee shall take reasonable response steps in accordance with Section C** - Compliance Response Plan ~~Failure to take Response Steps,~~ **Preparation, Implementation, Records, and Reports.**~~for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.~~ **A pressure reading that is outside the above mentioned range is not a deviation from this permit.** Failure to take response steps in accordance with Section C - Compliance ~~Monitoring~~ **Response** Plan - ~~Failure to take Response Steps,~~ **Preparation, Implementation, Records, and Reports,** shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.2.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the end trim system, at least once per shift when these facilities are in operation when venting to the atmosphere. ~~Unless operated under conditions for which the Compliance Response Plan specifies otherwise~~ **When for any one reading**, the pressure drop across the baghouse ~~shall be maintained within~~ **is outside** the **normal** range of 0.5 and 6.5 inches of water or a range established during the latest stack test~~. The~~ **, the Permittee shall take reasonable response steps in accordance with Section C** - Compliance Response Plan - ~~Failure to Take Response Steps~~ **Preparation, Implementation, Records, and Reports**. ~~for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.~~ **A pressure reading that is outside the above mentioned range is not a deviation from this permit.** Failure to take response steps in accordance with Section C - Compliance ~~Monitoring~~ **Response** Plan - ~~Failure to Take Response Steps~~ **Preparation, Implementation, Records, and Reports,** shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.3.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the cage mill flash dryer and kettle/hot pits (BCM1, BCS1, and BCS2), at least once per shift when the facilities are in operation when venting to the atmosphere. ~~Unless operated under conditions for which the Compliance Response Plan specifies otherwise~~ **When for any one reading,** the pressure drop across the baghouse ~~shall be maintained within~~ **is outside** the **normal** range of 0.5 and 6.5 inches of water or a range established during the latest stack test. ~~The~~ **, the Permittee shall take reasonable response steps in accordance with Section C** - Compliance Response Plan ~~Failure to take Response Steps,~~ **Preparation, Implementation, Records, and Reports.**~~for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.~~ **A pressure reading that is outside the above mentioned range is not a deviation from this permit.** Failure to take response steps in accordance with Section C - Compliance ~~Monitoring~~ **Response** Plan - ~~Failure to take Response Steps,~~ **Preparation, Implementation, Records, and Reports,** shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

7. Part 70 requires any application form, report, or compliance certification to be certified by the Responsible Official. IDEM, OAQ has revised C.8 Asbestos Abatement Projects to clarify that the asbestos notification does not require a certification by the responsible official, but it does need to be certified by the owner or operator. IDEM, OAQ has revised C.18 Actions Related to Noncompliance Demonstrated by a Stack Test; a certification by the responsible official is required for the notification sent in response to non-compliance with a stack test.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do ~~not~~ require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

8. The IDEM, OAQ has restructured Condition C.17 to clarify the contents and implementation of the Compliance Response Plan. The language regarding the OAQ's direction to excuse failure to perform monitoring under certain conditions has been deleted. The OAQ retains this discretion to excuse minor incidents of missing data; however, it is not necessary to state criteria regarding the exercise of that discretion in the permit. In C.17 (c)(2) "administrative amendment" has been revised to "minor permit modification," because 326 IAC 2-7-11(a)(7) has been

repealed. The title Compliance Monitoring Plan has been changed to Compliance Response Plan throughout the permit.

C.17 Compliance ~~Monitoring~~ **Response** Plan - ~~Failure to take Response Steps,~~ **Preparation, Implementation, Records, and Reports** [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to **prepare** ~~implement: a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:~~

~~(1) This condition;~~

~~(2) The Compliance Determination Requirements in Section D of this permit;~~

~~(3) The Compliance Monitoring Requirements in Section D of this permit;~~

~~(4) The Record Keeping and Reporting Requirements in Section C (General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and~~

~~(5)~~ ~~A~~ **a** Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. **A** CRP~~'s~~ shall be submitted to IDEM, OAQ upon request ~~and shall be subject to review and approval by IDEM, OAQ,~~. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee**, supplemented from time to time by the Permittee,** ~~and~~ maintained on site, and ~~is~~ comprised of:

~~(A)~~**(1)** Reasonable response steps that may be implemented in the event that ~~compliance related information indicates that~~ a response step is needed pursuant to the requirements of Section D of this permit; and **an expected timeframe for taking reasonable response steps.**

~~(B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.~~

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition **as follows:** ~~Failure to take reasonable response steps may constitute a violation of the permit.~~

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee

shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(2) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(3) Failure to take reasonable response steps shall constitute a violation of the permit.

(c) ~~Upon investigation of a compliance monitoring excursion, the~~ **The** Permittee is ~~excused from taking~~ **not required to take any** further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment **and** ~~This shall be an excuse from taking further response steps providing that~~ prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for ~~an administrative amendment~~ **a minor permit modification** to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

~~(d)~~**(e)** ~~Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken.~~ **The Permittee shall record all instances when response steps are taken.** In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

~~(e)~~**(f)** **Except as otherwise provided by a rule or provided specifically in Section D,** all monitoring **as** required in Section D shall be performed ~~at all times~~ **when** the ~~equipment~~ **emission unit** is operating, **except for time necessary to perform quality assurance and maintenance activities.** ~~If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.~~

~~(f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be~~

~~considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.~~

9. The Kason Sifter, identified as unit 0608, is exempt per E 073-14500-00031, issued August 28, 2001. While designated an exempt unit, it has been included in the list of significant units because its emissions are exhausted to baghouse BLB2 which also controls emissions from several significant units. The permit has been modified, as follows, to clarify that the unit is exempt:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(p) One (1) Kason Sifter, identified as emission unit 0608, installed in 2000, with a maximum capacity of 5,256 tons pers year, using integral baghouse ~~BLB1~~ **BLB2** for control and exhausting indoors **(Note that this unit is exempt per E 073-14500-00031, issued August 28, 2001).**

The same change was made to the facility description in permit section D.1.

10. The follow changes has been made to clarify which baghouses must be in operation at all times the facilities are in operation and that visible emissions notations are required from the buildings enclosing fugitive emission sources 0602 through 0606:

D.1.5 Particulate Matter (PM)

In order to comply with Conditions D.1.1 and D.1.3, ~~all~~ baghouses **BSR1, BRC1, BST1, BST2, BLB1, BLB2, BSH1, BBM1, BSC1, BSB1, BSB2, BSP1, BAS1, and BAS2**, including those integral to the process, for PM control shall be in operation and control emissions from ~~the following~~ facilities **0302, 0303, 0306, 0307, 0308, 0501, 0502, 0601, 0607, 0608, 0801 through 0817, and 0908 through 0910** at all times that these facilities are in operation:

~~Reclaim storage bin, recycle crushing/biogrinders, FGD bin discharge belt conveyor, reclaim bin discharge belt conveyor, cage mill flash drying system, landplaster kettle feed bins, ball mill accelerator pneumatic system, Kason sifter, kettle/hot pits, stucco recirculating bucket elevators, stucco cooling airveyor, stucco reject storage bin, stucco storage bins, entoleter, rotary screen, pneumatic transfer of reject stucco, 18" screw conveyor (hot pit collection), 18" screw conveyor (weigh belt scalping), 24" screw conveyors (stucco collection), 24" screw conveyors (stucco transport), 12" screw conveyor (reject stucco & paper), 9" screw conveyor (return stucco dust), reject stucco bucket elevator, weigh belt feeder (stucco supply), pin mixer, pneumatic transfer from truck, starch storage bin, and additives coating belt.~~

D.1.6 Visible Emissions Notations

(a) Once per shift visible emission notations of the buildings enclosing the transfer points of fugitive emission sources 0201, 0304, 0305, **0602 - 0606,** and 0901 - 0907, fugitive emission source 0301, and of the exhaust from stacks SCS1, SCS2, SAS1, SSH1, and SSC1 shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

11. The following change has been made to clarify that the amount of DENS wallboard must also be recorded in order to document compliance with D.2.2:

D.2.10 Record Keeping Requirements

(a) To document compliance with Condition D.2.2, the Permittee shall maintain records of the amount of VOC per 1000 square feet of board for both non-DENS and DENS wallboard production **and the amount of DENS wallboard produced**. The material

balance calculations, based on the quantity and composition of the additives used, performed to calculate the VOC usage shall also be included in these records.

(b) To document compliance with Condition D.2.6, the Permittee shall maintain records of visible emission notations of the stack exhaust from stack SBF1 - SBF5 once per shift during DENS production.

(c) To document compliance with Condition D.2.7, the Permittee shall maintain the following:

(1) Once per shift records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle operation.

(2) Documentation of the dates vents are redirected.

(d) To document compliance with Condition D.2.8, the Permittee shall maintain records of the results of the inspections required under Condition D.2.8 and the dates the vents are redirected.

(e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	G-P Gypsum Corporation
Source Location:	484 East County Road, 1400 North, Wheatfield, IN 46392
County:	Jasper
SIC Code:	3275
Operation Permit No.:	T 073-12597-00031
Permit Reviewer:	ERG/BS

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from G-P Gypsum Corporation relating to the operation of a wallboard manufacturing plant.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One (1) raw materials truck dumping station, identified as emission unit 0201 and installed in 1999.

(b) One (1) FGD storage bin, identified as emission unit 0301, installed in 1999, with a maximum capacity of 300 tons.

(c) One (1) reclaim storage bin, identified as emission unit 0302, installed in 1999, with a maximum capacity of 100 tons, using integral baghouse BSR1as control and exhausting indoors.

(d) Two (2) biogrinders, identified as emission unit 0303, installed in 1999, with a maximum throughput of 131,400 tons/yr, using integral baghouse BRC1 and exhausting indoors.

(e) One (1) FGD storage building, identified as emission unit 0304, installed in 1999, with a maximum capacity of 50,000 tons of FGD and other gypsum materials.

(f) FGD Conveyors from NIPSCO, identified as emission unit 0305, installed in 1999, with a maximum throughput of 723,000 tons/yr including:

(1) FGD conveyors from NIPSCO to the FGD building

(2) FGD bin infeed conveyors

(3) FGD steele feeder belt and sandwich belt conveyor

(g) Reclaim conveyors from the steele feeder to the reclaim bin, identified as emission unit 0306, installed in 1999, with a maximum throughput of 131,400 tons/yr using integral baghouse BRC1 as control and exhausting indoors.

(h) One (1) FGD bin discharge belt conveyor, identified as emission unit 0307, installed in 1999, with a maximum throughput of 723,000 tons/yr using integral baghouse BST1 and BST2 as control of the transfer point from the reclaim bin discharge belt conveyor to this unit.

(i) One (1) reclaim bin discharge belt conveyor, identified as emission unit 0308, installed in 1999, with a maximum throughput of 131,400 tons/yr, using integral baghouse BST1 or BST2 as control and exhausting indoors.

(j) One (1) landplaster kettle feed bin, identified as emission unit 0501, installed in 1999, with a maximum capacity of 100 tons, using integral baghouse BLB1 as control and exhausting indoors.

(k) One (1) landplaster kettle feed bin, identified as emission unit 0502, installed in 1999, with a maximum capacity of 100 tons, using integral baghouse BLB2 as control and exhausting indoors.

(l) One (1) totally enclosed landplaster bin with feeder, identified as emission unit 0601, installed in 1999, with a maximum capacity of 5 tons using integral baghouse BLB2 for control and exhausting indoors.

(m) One (1) totally enclosed volumetric feeder lignosulfate, identified as emission unit 0602, installed in 1999, with a maximum capacity of 5 cubic feet.

(n) Four (4) totally enclosed ball mills, identified as emission units 0603-0606, installed in 1999, each with a maximum throughput of 300 lbs/hr.

(o) One (1) ball mill accelerator pneumatic system, identified as emission unit 0607, installed in 1999, with a maximum capacity of 5,256 tons per year, using integral baghouse BBM1 as control and exhausting indoors.

(p) One (1) Kason Sifter, identified as emission unit 0608, installed in 2000, with a maximum capacity of 5,256 tons pers year, using integral baghouse BLB1 for control and exhausting indoors.

(q) Two (2) kettle heaters, identified as emission unit 0701, installed in 1999, with a maximum heat input rate of 20 MMBTU/hr and exhausting to stack SCS1.

(r) Two (2) kettle heaters, identified as emission unit 0702, installed in 1999, with a maximum heat input rate of 20 MMBTU/hr and exhausting to stack SCS2.

(s) Two (2) stucco recirculating bucket elevators, identified as emission unit 0801, installed in 1999, with a maximum throughput of 876,000 tons/yr, using integral baghouse BSH1 for control and exhausting to stack SSH1.

(t) One (1) stucco cooling airveyor, identified as emission unit 0802, installed in 1999, with a maximum throughput of 525,600 tons/yr, using integral baghouse BSC1 for control and exhausting to stack SSC1.

(u) One (1) stucco reject storage bin, identified as emission unit 0803, installed in 1999, with a maximum capacity of 5 tons, using integral baghouse BSH1 for control and exhausting to stack SSH1.

(v) One (1) stucco storage bin, identified as emission unit 0804, installed in 1999, with a maximum capacity of 300 tons, using integral baghouse BSB1 for control and exhausting indoors.

(w) One (1) stucco storage bin, identified as emission unit 0805, installed in 1999, with a maximum capacity of 300 tons, using integral baghouse BSB2 for control and exhausting indoors.

(x) One (1) entoleter, identified as emission unit 0806, installed in 1999, with a maximum throughput of 525,600 tons/yr, using integral baghouse BSH1 for control and exhausting to stack SSH1.

(y) One (1) rotary screen, identified as emission unit 0807, installed in 1999, with a maximum throughput of 525,600 tons/yr, using integral baghouse BSH1 for control and exhausting to stack SSH1.

(z) One (1) pneumatic transfer of reject stucco, identified as emission unit 0808, installed in 1999, with a maximum throughput of 219,000 tons/yr, using integral baghouse BSP1 for control and exhausting indoors.

(aa) One (1) 18" screw conveyor (/hot pit collection), identified as emission unit 0809, installed in 1999, with a maximum throughput of 525,600 tons/yr, using integral baghouse BSH1 for control and exhausting to stack SSH1.

(bb) One (1) 18" screw conveyor (weigh belt scalping), identified as emission unit 0810, installed in 1999, with a maximum throughput of 525,600 tons/yr, using integral baghouse BSH1 for control and exhausting to stack SSH1.

(cc) Two (2) 24" screw conveyors (stucco transfer), identified as emission unit 0811, installed in 1999, with a maximum throughput of 876,000 tons/yr per conveyor, using integral baghouse BSH1 for control and exhausting to stack SSH1.

(dd) Two (2) 24" screw conveyors (stucco transfer), identified as emission unit 0812, installed in 1999 with, a maximum throughput of 876,000 tons/yr per conveyor, using integral baghouse BSH1 for control and exhausting to stack SSH1.

(ee) One (1) 12" screw conveyor (reject stucco & paper), identified as emission unit 0813, installed in 1999, with a maximum throughput of 219,000 tons/yr, using integral baghouse BSH1 for control and exhausting to stack SSH1.

(ff) One (1) 9" screw conveyor (return stucco dust), identified as emission unit 0814, installed in 1999, with a maximum throughput of 43,000 tons/yr, using integral baghouse BSH1 for control and exhausting to stack SSH1.

(gg) One (1) reject stucco bucket elevator, identified as emission unit 0815, installed in 1999, with a maximum throughput of 525,600 tons/yr, using integral baghouse BSH1 for control and exhausting to stack SSH1.

(hh) One (1) weigh belt feeder (stucco supply), identified as emission unit 0816, installed in 1999, with a maximum throughput of 525,600 tons/yr, using integral baghouse BSH1 for control and exhausting to stack SSH1.

(ii) One (1) pin mixer, identified as emission unit 0817, installed in 1999, with a maximum production of 250,000 lbs of wet board/hr, using integral baghouse BSH1 for control and exhausting to stack SSH1.

(jj) Seven (7) dry additive bins , identified as emission units 0901-0907, installed in 1999, each with a maximum capacity of 300 tons.

(kk) One (1) pneumatic transfer from truck, identified as emission unit 0908, installed in 1999, with a maximum capacity of 20,000 tons/year, using integral baghouse BAS1 for control and exhausting to stack SAS1.

(ll) One (1) starch storage bin, identified as emission unit 0909, installed in 1999, with a maximum capacity of 40 tons, using integral baghouse BAS1 for control and exhausting to stack SAS1.

(mm) One (1) additives coating belt, identified as emission unit 0910, installed in 1999, with a maximum throughput of 21,840 tons/yr, using integral baghouse BAS2 for control and exhausting indoors.

(nn) Eight (8) direct flame burners, identified as emission unit 1001, installed in 1999, with a total heat input rate of 20 MMBTU/hr and exhausting indoors.

(oo) One (1) end trim system including, 2 pre-cut saws, 2 bundlers with end trim saw, a riser saw and a re-cut saw, identified as emission unit 1002, installed in 1999, with a maximum throughput of 8,650 tons/yr of end trim, using integral baghouse BST1 or BST2 for control and exhausting indoors.

(pp) One (1) wet end seal, identified as emission unit 1003, installed in 1999, with a maximum throughput of 701,588 MSF/yr and exhausting to stack SBF5.

(qq) One (1) board forming dryer zone one, identified as emission unit 1004, installed in 1999, with a maximum heat input rate of 50 MMBTU/hr and exhausting to stack SBF1.

(rr) One (1) board forming dryer zone two, identified as emission unit 1005, installed in 1999, with a maximum heat input rate of 40 MMBTU/hr and exhausting to stack SBF2.

(ss) One (1) board forming dryer zone three, identified as emission unit 1006, installed in 1999, with a maximum heat input rate of 30 MMBTU/hr and exhausting to stack SBF3.

(tt) One (1) dry end seal, identified as emission unit 1007, installed in 1999, with a maximum throughput of 701,588 MSF/yr and exhausting to stack SBF4.

(uu) One (1) cage mill flash drying system, identified as emission unit 0401, installed in 1999, with a maximum production of 144,000 pounds of landplaster per hour, using integral baghouse BCM1 as control and exhausting to stack SCM1.

(vv) One (1) cage mill flash dryer air heater, identified as emission unit 0402, installed in 1999, with a maximum heat input rate of 40 MMBTU/hr and exhausting to stack SCM1.

(ww) One (1) kettle/hot pit, identified as emission unit 0703, installed in 1999, with a maximum production of 60,000 lbs of stucco/hr, using integral baghouse BCS1 for control and exhausting to stack SCS3.

(xx) One (1) kettle/hot pit, identified as emission unit 0704, installed in 1999, with a maximum production of 60,000 lbs of stucco/hr, using integral baghouse BCS2 for control and exhausting to stack SCS4.

(yy) One (1) cold cleaner degreaser, identified as emission unit 1101 and installed in 1999.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment

There are no new facilities operating at this source during the review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with a heat input equal to or less than ten million (10,000,000) British thermal units per hour (BTU/hr): 12 natural gas heaters, 2 air make-up units.

(b) Propane-fired combustion sources with a heat input equal to or less than six million (6,000,000) British thermal units per hour (BTU/hr): 12 portable propane heating units.

(c) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month: diesel fuel tank with a storage capacity of 1000 gallons and fueling system for trucks and mobile equipment.

(d) A propane bleed-off tank with a storage capacity of 1000 gallons.

(e) Portable drums, barrels, totes, and miscellaneous containers with a storage capacity less than 1000 gallons and an annual throughput of less than 12,000 gallons.

(f) Unpaved roads with public access.

(g) A 250 HP back-up generator and diesel storage tank with a capacity of 450 gallons.

(h) Emergency equipment: a 150 HP diesel-driven fire pump and a fire pump diesel fuel storage tank with a capacity of 297 gallons.

(i) A laboratory as defined in 326 IAC 2-7-1(21)(D).

(j) The following activities having a potential uncontrolled emissions equal to or less than the insignificant thresholds described in 326 IAC 2-7-1(21):

(1) Paper unrolling and feeding,
(2) Ink printing on gypsum board,
(3) A Storburn model 60K toilet.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) CP 073-9573-00031, issued on September 23, 1998; and

(b) E 073-14500-00031, issued August 28, 2001.

All conditions from previous approvals were incorporated into this Part 70 permit.

Air Pollution Control Justification as an Integral Part of the Process

While under review for a part 70 permit, the company has submitted the following justification such that baghouses BSR1, BRC1, BST1, BCM1, BLB1, BSB2, BBM1, BCS1, BCS2, BSH1, BST2, BSC1, BSB1, BSB2, BSP1, BAS1, and BAS2 be considered as an integral part of the manufacture of wallboard:

In the gypsum industry, baghouses are considered Best Available Control Technology (BACT), but their primary purpose is process related rather than pollution control. These baghouses are utilized primarily as a means to collect, consolidate, and transfer process materials/products from a pneumatic conveyance system to a screw conveyor, storage bin, belt conveyor, or stockpile. These functions are evident in the process flow diagrams for the facility. Consequently, the production of wallboard at this source is dependent on the operation of these process baghouses.

IDEM, OAQ has evaluated the justifications and agreed that baghouses BSR1, BRC1, BST1, BCM1, BLB1, BSB2, BBM1, BCS1, BCS2, BSH1, BSC1, BSB1, BSB2, BSP1, BAS1, and BAS2 will be considered as an integral part of the manufacturer of wallboard. Therefore, the permitting level will be determined using the potential to emit after the baghouses. Operating conditions in the proposed permit will specify that the baghouses shall operate at all times when the wallboard manufacturing process is in operation. The determination that these baghouses are integral to the process was made during the Title V review process. The construction permit for this source (073-9573-00031) did not include a determination regarding the integral nature of the baghouses.

Enforcement Issue

(a) IDEM is aware that a Kason Sifter, identified as emission unit 0608, installed in 2000, with a maximum capacity of 5,256 tons per year, using baghouse BLB2 for control and exhausting indoors has been constructed and operated prior to receipt of the proper permit. A permit application for unit 0608 has been submitted to IDEM and exemption E 073-14500-00031 was issued on August 28, 2001.

(b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on August 9, 2000. A Notice of Completeness was not sent to the source. Additional information was received on November 1, 2000.

Emission Calculations

See Appendix A of this document for detailed emissions calculations pages 1 through 8.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air

pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE after the baghouses. Baghouses for this source are considered integral to the process.

Pollutant	Potential To Emit (tons/year)
PM	151.96
PM-10	151.96
SO_2	0.58
VOC	100.61
CO	80.94
NO_x	113.88

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAPs	Potential To Emit (tons/year)
Hexane	1.73
TOTAL	1.73

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC, PM-10, and NOx are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the potential to emit 235.05 tpy PM and 67.84 tpy PM-10 fugitive emissions are not counted toward determination of 326 IAC 2-7 (Part 70 Permit Program), PSD, and Emission Offset applicability.

Actual Emissions

No previous emission data has been received from the source.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

	Limited Potential to Emit (tons/year)						
Process/Facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
NG Combustion	7.32	7.32	0.58	3.37	80.94	113.88	1.734
PM Sources	69.22	69.22	0	0	0	0	0
Additive Tanks	0	0	0	0.72	0	0	0

Process/Facility	Limited Potential to Emit (tons/year)						
	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Degreasers	0	0	0	1.8	0	0	0
Board Dryers*	36.12	36.12	0	80.09	0	0	0
Total Emissions	112.66	112.66	0.58	85.98	80.94	113.88	1.734

Note: The estimated fugitive emissions from truck dumping and paved roads are 235.05 PM and 67.84.
*The potential to emit for the board dryers is based on a combined maximum production of 701,588 1000 square feet/yr for both DENS and non-DENS production. The term DENS refers to a product line unique to Georgia Pacific that has a higher VOC content and produces greater PM emissions than non-DENS wallboard. The limited potential to emit for the board dryers is based on a limited production of 168,000 1000 square feet/yr for DENS production and a production of 533,588 1000 square feet/yr for non-DENS production. This limit on DENS production is based on a BACT analysis that was conducted and included in the construction permit to satisfy the provisions of 326 IAC 8-1-6.

County Attainment Status

The source is located in Jasper County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Jasper County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Jasper County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

(a) This gypsum processing plant is subject to the New Source Performance Standard 326 IAC 12, 40 CFR 60.670 through 60.676, Subpart OOO. This rule requires the particulate emissions from:

(1) The crushing operations (emission unit 0303) to be limited to fifteen percent (15%) opacity or less, and

(2) The screening and conveying operations (emission units 0301-0308, 0501, 0502, 0601, 0603-0606, 0608, 0801, 0803-0807, 0815, 0816, 0902, 0907, 0909, 0910) to be limited to ten percent (10%) or less, and

(3) The emission vents enclosed in buildings shall be limited to 7% opacity and 0.02 grains per dry standard cubic foot (gr/dscf).

(b) The calcining kettles (emission units 0703 and 0704) and the cage mill flash dryer (emission unit 0401) are subject to the New Source Performance Standard 326 IAC 12, 40 CFR 60.730 through 60.737, Subpart UUU. This rule requires the particulate emissions from these facilities to be limited as follows:

(1) 10% opacity or less

(2) 0.04 gr/dscf

(c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR 63 Subpart T) applicable to this source. 40 CFR 63 Subpart T does not apply to the degreaser because it does not use any solvent containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride or chloroform or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent.

(d) This source is not subject to the provisions of 40 CFR 64, Compliance Assurance Monitoring. In order for this rule to apply, a specific emissions unit must meet three criteria for a given pollutant: 1) the unit is subject to an emission limitation or standard for the applicable regulated air pollutant, 2) the unit uses a control device to achieve compliance with any such emission limitation or standard, and, 3) the unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount required for a source to be classified as a major source. For this source, no specific emissions unit has emissions greater than one hundred (100) tons per year, the major source threshold for criteria pollutants, of PM10, SO_2, CO, VOC, or NO_x or greater than ten (10) tons per year of any single HAP or twenty-five (25) tons per year of any combination of HAPs, the major source threshold for HAPs. Therefore, 40 CFR 64 is not applicable.

State Rule Applicability - Entire Source

326 IAC 1-5-2 (Emergency Reduction Plans)
The source submitted an Emergency Reduction Plan (ERP) on November 30, 1999.

326 IAC 2-2 (Prevention of Significant Determination (PSD))
This source is considered a minor source for PSD. Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source

Performance Standards that were in effect on August 7, 1990, fugitive emissions were not counted toward determinations of PSD applicability.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of PM and PM-10. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (OpacityLimitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacityshall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging periodas determined in 326 IAC 5-1-4.

(b) Opacityshall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readingsas measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations)

(a) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the following facilities shall not exceed the pound per hour rate established in the table below.

Emission Source	Emission Source ID	Air Pollution Control Device ID	Maximum Throughput (tpy)	Maximum Throughput (lbs/hr)	Maximum Throughput (tons/hr)	Maximum Allowable Emission Rate (lb/hr)
Truck Dumping FGD	0201	NA	300,000	68,493	34	41
Storage Bin	0301	NA	723,000	165,068	83	49
Reclaim Storage Bin	0302	BSR1	131,400	30,000	15	25
Recycle Crushing/Bio Grinder	0303	BRC1	131,400	30,000	15	25
FGD Storage Building	0304	NA	723,000	165,068	83	49
FGD Conveyors from NIPSCO	0305	NA	723,000	165,068	83	49
Reclaim Bin Infeed Conveyors	0306	BRC1	131,400	30,000	15	25
FGD Bin Discharge Conveyor	0307	BST1 or BST2	723,000	165,068	83	49
Reclaim Bin Discharge Conveyors	0308	BST1 or BST2	131,400	30,000	15	25
Cage mill flash dryer system	0401	BCM1	630,720	144,000	72	48

Emission Source	Emission Source ID	Air Pollution Control Device ID	Maximum Throughput (tpy)	Maximum Throughput (lbs/hr)	Maximum Throughput (tons/hr)	Maximum Allowable Emission Rate (lb/hr)
Kettle Feed Landplaster Bins #1	0501	BLB1	315,360	69,000	30	40
Kettle Feed Landplaster Bins #2	0502	BLB2	315,360	69,000	30	40
Landplaster Bin with Feeder	0601	BLB2	5,256	1,200	1	3
Volumetric Feeder Lignosulfate	0602	NA	7,096	1,620	1	4
Ball Mill #1	0603	NA	1,314	300	0.15	1
Ball Mill #2	0604	NA	1,314	300	0.15	1
Ball Mill #3	0605	NA	1,314	300	0.15	1
Ball Mill #4	0606	NA	1,314	300	0.15	1
Ball Mill Accelerator Pneumatic System	0607	BBM1	2,200	502	0.15	2
Kason Sifter	0608	NA	5,256	1,200	1	3
Kettle & Hot Pit #1	0703	BCS1	262,800	60,000	30	40
Kettle & Hot Pit #2	0704	BCS2	262,800	60,000	30	40
Stucco Recirculating Bucket Elevators	0801	BSH1	876,000	200,000	100	51
Stucco Cooling Airveyor	0802	BSC1	525,600	120,000	60	46
Stucco Reject Storage Bin	0803	NA	219,000	50,000	25	35
Stucco Storage Bin #1	0804	BSB1	876,000	200,000	100	51
Stucco Storage Bin #2	0805	BSB2	876,000	200,000	100	51
Entoleter	0806	NA	525,600	120,000	60	46
Rotary Screen	0807	NA	525,600	120,000	60	46
Pneumatic Transfer of Reject Stucco	0808	BSP1	219,000	50,000	25	35
18" Screw Conveyor, Hot Pit Collector	0809	BSH1	525,600	120,000	60	46
18" Screw Conveyor, Weigh Belt Scalping	0810	BSH1	525,600	120,000	60	46
2 24" Screw Conveyors, Stucco Collection	0811	BSH1	1,752,000	400,000	200	59
2 24" Screw Conveyors, Stucco Transport	0812	BSH1	1,752,000	400,000	200	59
12" Screw Conveyor, Reject Stucco and Paper	0813	BSH1	219,000	50,000	25	35
9" Screw Conveyor, Return Stucco Dust	0814	BSH1	43,000	9,817	5	12

Emission Source	Emission Source ID	Air Pollution Control Device ID	Maximum Throughput (tpy)	Maximum Throughput (lbs/hr)	Maximum Throughput (tons/hr)	Maximum Allowable Emission Rate (lb/hr)
Reject Stucco Bucket Elevator	0815	BSH1	525,600	120,000	60	46
Weigh Belt Feeder, Stucco Supply	0816	BSH1	525,600	120,000	60	46
Pin Mixer	0817	BSH1	887,388	202,600	101	51
Dry Additive Storage Bins	0901-0907	NA	42,805	9,773	5	12
Starch Pneumatic System	0908,0909	BAS1	20,000	4,566	2	7
Additives Collecting Belt	0910	BAS2	21,840	4,986	2	8

*The maximum allowable emission rate at 8,760 hours/yr will exceed 250 tpy. However, PM emissions from all stacks exhausting to the atmosphere at the source are limited to 0.02 gr/dscf or 0.04 gr/dscf (achievable through the use of baghouses for PM control); with the exception of stacks SBF1 through SBF5, which have a PM PTE of 3.99 tpy. The resulting limited emissions are 112.66 tpy.

The pounds per hour limitations were calculated with the following equations:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

or depending on the process weight rate:

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 55.0\ P^{0.11} - 40$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

The baghouses shall be in operation at all times the applicable facilities are in operation, in order to comply with this limit.

(b) Pursuant to 326 IAC 6-3-2 (Process Operations):

(1) The allowable PM emission rate from the end trim system shall not exceed 47.4 pounds per hour when operating at a process weight rate of 67.5 tons per hour.

(2) The allowable PM emission rate from the wet and dry end seals and the board forming dryer, zones 1 through 3, shall not exceed 53.5 lb/hr when operating at a process weight rate of 125 tons per hour.

The pounds per hour limitations were calculated using the following equation:

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 55.0\ P^{0.11} - 40$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

The maximum throughput to the bound dryers is 125 tons/hr, however, these facilities are still subject to the annual production limit in Condition D.2.3.

(c) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the cage mill flash dryer shall not exceed 48 lbs/hr when operating at a maximum capacity flow rate of 144,000 lbs/hr. The kettle heaters shall not exceed 40 lbs/hr when operating at a maximum capacity flow rate of 60,000 lbs/hr.

The pound per hour limitations were calculated using one of the following equations:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

or depending on the process weight rate:

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 55.0\ P^{0.11} - 40$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

326 IAC 8-1-6 (New facilities General Reduction Requirement)

Pursuant to CP-073-9573-00031 and 326 IAC 8-1-6 (New Facilities General Reduction Requirements), volatile organic compound (VOC) emissions from the wallboard dryer shall have the following limitations (based on the assumption that all VOC in the wallboard are emitted during the drying process):

(a) When producing non-DENS wallboard, VOC emissions shall not exceed 0.19 lbs VOC per 1000 ft^2 board,

(b) When producing DENS wallboard, production is limited to 168,000 MSF (1000 ft^2) per 12 consecutive month period and VOC emissions shall not exceed 0.35 lbs VOC per 1000 ft^2 board,

(c) The emission limits specified in (a) and (b) above shall be determined from material balance calculations based on the quality and composition of the additives used in the wallboard production process rolled on a 12 month average.

These limits are based on a BACT analysis for the wallboard dryers conducted by G-P Gypsum and approved by OAQ. This analysis was conducted during the construction permit review process and was included in the issued construction permit.

326 IAC 8-3-2 (Cold Cleaner Operations)

For the cold cleaner type degreaser (parts washer) labeled as (M) in the Permittee Emission Units and Pollution Control Equipment Section, the owner or operator shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with an emissions unit for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a matter that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

The cold cleaner type degreaser (parts washer) labeled as (M) in the Permitted Emission Units and Pollution Control Equipment Section, is subject to the requirements of 326 IAC 8-3-5(a) and 8-3-5(b). This rule requires that the owner or operator of a cold cleaner degreaser facility shall ensure that the degreaser is equipped with a cover that must be designed so that it can be easily operated with one (1) hand if certain conditions exist. The degreaser must be equipped with a facility for draining cleaned articles.

Testing Requirements

Neither PM or VOC stack tests will be required for this source. The most significant source of VOC emissions at the source is the board dryers. These dryers are subject to production limits under 326 IAC 8-1-6 (New Facilities General Reduction Requirements). There is no control device and the allowables are less than ten pounds per hour. Therefore, VOC testing is not necessary. PM is the “major” pollutant. However, there is no single facility that has a potential to emit that accounts for greater than forty percent of the total potential to emit. Compliance testing required by 40 CFR 60.675 and 60.736 was completed in November 1999 and October 2000. Results from the testing demonstrated that all units were in compliance. Therefore, PM and opacity testing is not necessary. In addition, there have been no indications of possible non-compliance from potential to emit calculations or from the inspector.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source’s failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The facilities listed as (a) through (xx) have applicable compliance monitoring conditions as specified below:

   (a) Once per shift visible emissions notations of the buildings enclosing fugitive emission sources 201, 301, 304, 305, 901-907, and of the exhaust from stacks SCM1, SAS1, SCS1-SCS4, SSH1, SSC1, and SBF1-SBF5, shall be performed

during normal daylight operations when exhausting to the atmosphere. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

(b) The Permittee shall record the total static pressure drop across the baghouses controlling the facilities listed in (a) through (xx), at least once per shift when the facilities are in operation and exhausting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 0.5 to 6.5 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

These monitoring conditions are necessary to ensure compliance 40 CFR 60, Subpart 000 and 326 IAC 2-7 (Part 70).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the 1990 Clean Air Act. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Quality (OAQ) Part 70 Application Form GSD-08.

(a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act.

(b) See attached calculations for detailed air toxic calculations page 2.

Conclusion

The operation of this wallboard manufacturing source shall be subject to the conditions of the attached proposed Part 70 Permit No. T073-12597-00031.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler

Company Name: GP-Gypsum Corporation
Address City IN Zip: 484 East County Rd, 1400 North, Wheatfield, IN 46392
CP: 12597
Plt ID: 00031
Reviewer: Bob Sidner
Date: 10/16/2000

Edge Heater and Board Dryers:

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
140.0	1226.4

Cage Mill Flash Dryer and Calciner Kettles:

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
80.0	700.8

Total:

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
220.0	1927.2

Pollutant

	PM*	PM10*	SO2	NOx**	NOx***	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100.0 **see below	150.0	5.5	84.0
Potential Emission in tons/yr	7.32	7.32	0.58	61.32	52.56	3.37	80.94

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32
***The NOx emission factor for the cage mill flash dryer and calcing kettles was developed by the manufacturer and is used in place of the AP-42 factor.

Methodology
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler
HAPs Emissions

Company Name: GP-Gypsum Corporation
Address City IN Zip: 484 East County Rd, 1400 North, Wheatfield, IN 46392
CP: 12597
Plt ID: 00031
Reviewer: Bob Sidner
Date: 10/16/2000

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	2.024E-03	1.156E-03	7.227E-02	1.734E+00	3.276E-03

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	4.818E-04	1.060E-03	1.349E-03	3.662E-04	2.024E-03

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations
Particulate Matter

Company Name: GP-Gypsum Corporation
Address City IN Zip: 484 East County Rd, 1400 North, Wheatfield, IN 46392
CP: 12597
Plt ID: 00031
Reviewer: Bob Sidner
Date: 10/16/2000

Constants:
Initial amount of gypsum entering the plant = 100,000 lb/hr

SDCF:

T=	519.6	deg R (60 deg F)	grains/scdf=	0.02
P=	1	atm	grains/lb=	7000

Emission Source	Emission Source ID	Air Pollution Control Device ID	Exhaust Flow Rate (ACFM)	Temperature (deg F)	Volume Dry Air in Process (ACFM)	Volume of Dry Air at Standard Conditions (SDCF)	Potential PM Emissions (tpy)	Potential PM10 Emissions (tpy)
Cage mIll flash dryer (see note 1)	0401	BCM1	26500	200	19810	15603.20	11.72	11.72
Kettle Feed Landplaster Bins #1	0501	BLB1	1000	190	1000	799.77	0.60	0.60
Kettle Feed Landplaster Bins #2	0502	BLB2	1000	190	1000	799.77	0.60	0.60
Kettle & Hot Pit #1(see note 2)	0703	BCS1	10,000	225	6288	4771.86	3.58	3.58
Kettle & Hot Pit #2(see note 2)	0704	BCS2	10,000	225	6288	4771.86	3.58	3.58
Stucco Storage Bin #1	0804	BSB1	2000	200	2000	1575.29	1.18	1.18
Stucco Storage Bin #2	0805	BSB2	2000	200	2000	1575.29	1.18	1.18
Reclaim Storage Bin	0302	BSR1	2000	200	2000	1575.29	1.18	1.18
Dust Collector, Stucco Handling Equipment	0803, 0806-7, 0809-17	BSH1	10000	200	10000	7876.43	5.91	5.91
Stucco Cooling Airveyor	0802	BSC1	30000	195	30000	23809.74	17.88	17.88
Pneumatic Transfer of Reject Stucco	0808	BSP1	802	70	802	786.72	0.59	0.59
Ball Mill Accelerator Pneumatic System	0607	BBM1	120	70	120	117.71	0.09	0.09
Starch Pneumatic System	0908,0909	BAS1	1620	70	1620	1589.14	1.19	1.19
Additives Collecting Belt	0910	BAS2	57	70	57	55.91	0.04	0.04
End Trim and Reclaim Wallboard Belt Conveyors	0308, 1002	BST1	17000	70	17000	16676.17	12.52	12.52
Recycle Crushing/Bio Grinder	0303	BRC1	10000	70	10000	9809.51	7.37	7.37
TOTAL							**69.22**	**69.22**

Note 1: There is 6690 ft^3/min water released from the cage mill flash dryer. The volume of dry air in the process is equal to the exhaust flow rate minus the volume of water in the process (26500 - 6690 = 19810). See below for sample calcualtion.
Note 2: There is 3,712 ft^3/min chemical water released from kettle #1 and kettle #2. The volume of dry air in the process is equal to the exhaust flow rate minus the flow of chemical water (10,000 - 3,712 = 6,288).

Methodology:
Volume Dry Air at Standard Conditions (SCDF) = Volume Dry Air (ACFM) * Temperature at Standard Conditions (R) / Actual Temperature (R)
Potential PM/PM10 Emissions = Volume Dry Air (SCDF) * 0.02 grains/scdf / 7000 grains/lb / 2000 lb/ton * 60 min/hr * 8760 hrs/yr
In most cases, the exhaust air flow is equal to the volume of dry air exiting the device. However, this is not true of the cage mill flash dryer and the kettles (see notes 1 and 2 for further details).

Appendix A: Emissions Calculations
Particulate Matter

Company Name: GP-Gypsum Corporation
Address City IN Zip: 484 East County Rd, 1400 North, Wheatfield, IN 46392
CP: 12597
Plt ID: 00031
Reviewer: Bob Sidner
Date: 10/16/2000

Example Calculation : Cage Mill Flash Dryer

Emission source: Cage mIll flash dryer (BCM1)

Amount of gypsum going into process (lbs/hr):	100000
Flow Rate of Exhaust (ACFM):	26500
Temperature(deg F):	200
% free water content in gypsum entering process:	15%

Constants:

			SDCF:		
R=	0.73023	(ATM*FT^3)/(LBMOL*DEGR	T=	519.6	deg R (60 deg F)
T=	659.6	(deg R)	P=	1	atm
P=	1	(atm)			

Calculations:

Rate of moles of water going into process (lbmol/min) = water content in gysum (lbs/min)/18 lbs/lbmol H2O
= (100,000)*(0.15)/(60*18)
= 13.89

Volume of water in process (ft^3/min) = nRT/P
= (13.89*.73023*659.6)/1
= 6690

Volume of dry air in process @ 200 def F (ACFM) = Exhaust Flow Rate (ACFM) - volume of water in process (ft^3/min)
= (26,500)-(6690)
= 19810

Rate of moles of dry air exiting the process (lbmol/min) = PV/RT
= (19810*1)/(*.73023*659.6)
= 41

Volume of dry air in process @ 60 def F (SDCF) = Volume of dry air in process @ 200 def F (ACFM) * (519.6 deg R/659.6 deg R)
= 19810*519.6/659.6
= 15606

PM (tons/yr)
constants:

grains/scdf=	0.02
SDCF=	15606
grains/lb=	7000

Potential PM Emissions (tpy) = Volume dry air (SDCF) * 60 min/hr * 8760 hr/yr * 0.02 grains/scdf / 7000 grains/lb / 2000 lb/ton
= 15606*60*8760*0.02/7000/2000
= 11.72

Potential PM10 Emissions (tpy) = Potential PM Emissions = 11.72 tpy

Appendix A: Emissions Calculations
Particulate Matter from Fugitive Sources

Company Name: GP-Gypsum Corporation
Address City IN Zip: 484 East County Rd, 1400 North, Wheatfield, IN 46392
CP: 12597
Plt ID: 00031
Reviewer: Bob Sidner
Date: 10/16/2000

Truck Dumping

E = k(0.0032) * (U/5)^1.3 / (M/2)^1.4

E = Emission Factor (lbs/ton)
k = 0.35 particle size multilplier for PM-10
0.74 particle size multilplier for PM
U = 12.7 mean wind speed (mph)
M = 10% material moisture content (%)

Source: AP-42, chapter 13.2.4, p. 13.2.4-3

PM Emission Factor:
E = (0.74)(0.0032) * (12.7/5)^1.3 / (10%/2)^1.4
E = 0.53 lb/ton

PM-10 Emission Factor:
E = (0.35)(0.0032) * (12.7/5)^1.3 / (10%/2)^1.4
E = 0.25 lb/ton

Annual potential amount of gypsum delivered by truck = 300,000 tpy

Potential PM Emissions (tons/year) = Emission factor (lb/ton) * Gypsum delivered (tpy) / 2000 (lbs/ton)
Potential PM Emissions (tons/year) = 79.10 tpy

Potential PM-10 Emissions (tons/year) = Emission factor (lb/ton) * Gypsum delivered (tpy) / 2000 (lbs/ton)
Potential PM-10 Emissions (tons/year) = 37.41 tpy

Paved Roads

Maximum Vehicular Speed: 25 mph
Average Distance of Haul: 0.34 miles
Weighted Average Gross Weight: 8.75 tons

Vehicle Type	No. of One Way Trips per Hour	Weight
passenger car	60	2.5
truck	10	30
dump truck	10	25

Calculations:
E = k(sL/2)^0.65 * (W/3)^1.5

E = Emission factor (lbs/vehicle miles traveled(VMT))
k = 0.016 particle size multiplier for PM-10
0.082 particle size multiplier for PM
sL 12 road surface silt content (g/m^2) (based on silt content for concete batching)
W 8.75 weighted average vehicle weight (tons)

source: AP-42, chapter 13.2.1, p. 13.2.1-6.

VMT= (0.34 miles/trip * 80trips/hr * 8760 hrs/yr)
VMT= 238272

PM

E = (0.082)(12/2)^0.65 * (8.75/3)^1.5
E = 1.31 lbs/VMT

Potential PM Emissions (ton/yr) = Emission factor (lbs/VMT) * VMT / 2000 (lbs/ton)
Potential PM Emissions (ton/yr) = 1.31 * 238272 / 2000
Potential PM Emissions (ton/yr) = 155.95

PM-10

E = (0.016)(12/2)^0.65 * (8.75/3)^1.5
E = 0.26 lbs/VMT

Potential PM-10 Emissions (ton/yr) = Emission factor (lbs/VMT) * VMT / 2000 (lbs/ton)
Potential PM-10 Emissions (ton/yr) = 0.26 * 238272 / 2000
Potential PM-10 Emissions (ton/yr) = 30.43

Appendix A: Emissions Calculations
VOC emissions from Additive Tanks

Company Name: GP-Gypsum Corporation
Address City IN Zip: 484 East County Rd, 1400 North, Wheatfield, IN 46392
CP: 12597
Plt ID: 00031
Reviewer: Bob Sidner
Date: 10/16/2000

Tank ID	Size (gal)	Content*	Potential Throughput (gal/yr)**	Potential Turnovers	Potential VOC emissions (lb/yr)***	Potential VOC emissions (tpy)
0911	8000	additive	1,015,520	127	420.37	0.21
0912	8000	additive	1,015,520	127	420.37	0.21
0913	8000	additive	1,015,520	127	420.37	0.21
0914	200	additive	368,750	1793	61.88	0.03
0915	200	additive	368,750	1793	61.88	0.03
0916	200	additive	368,750	1793	61.88	0.03
TOTAL					**1446.75**	**0.72**

* The products stored in these three tanks are soap, wax emulsion and dispersant. The tanks have not been designated for a specific content, so they have been modeled with ethanol as a conservative estimate. Ethanol was chosen because it is a constituent of the dispersant and has the highest VOC content.

** The potential throughput was based on a potential production of 60 tph through the calcining kettles. The highest throughput for each size tank was used for all tanks of that size as a conservative estimate.

*** Potential VOC emissions were calculated using TANKS 4.0

Appendix A: Emissions Calculations
VOC emissions from Degreasers

Company Name: GP-Gypsum Corporation
Address City IN Zip: 484 East County Rd, 1400 North, Wheatfield, IN 46392
CP: 12597
Plt ID: 00031
Reviewer: Bob Sidner
Date: 10/16/2000

Solvent Used:	ZEP DYNA 143	
Solvent Consumption:	0.5	gal/day
	187.5	gal/yr
Solvent Density:	6.59	lbs VOC/gal

Potential VOC emissions (lbs/yr) = Solvent Consumption (gal/yr) * Solvent Density (lbs/gal)
Potential VOC Emissions (lbs/yr) = (187.5)*(6.59)
Potential VOC Emissions (lbs/yr) = 1235.63 lbs/yr

Potential VOC Emissions (lbs/yr) = 0.62 tons/yr

Appendix A: Emissions Calculations
VOC and PM emissions from Gypsum Board in Board Dryers

Company Name: GP-Gypsum Corporation
Address City IN Zip: 484 East County Rd, 1400 North, Wheatfield, IN 46392
CP: 12597
Plt ID: 00031
Reviewer: Bob Sidner
Date: 10/16/2000

Production

Maximumn Potential DENS production rate = 350,794 1000 ft^2/yr
Maximumn Potential non- DENS production rate = 350,794 1000 ft^2/yr

Emission Factors (based on stack test data from source):

DENS:
PM 0.43 lb/1000 ft^2
VOC 0.35 lb/1000 ft^2

Non-DENS:
PM negligible
VOC 0.19 lb/1000 ft^2

Emissions:

DENS:
Potential PM Emissions (tons/yr) = DENS max production (1000 ft^2/yr) * emission factor (lb/1000 ft^2) / 2000 lb/ton
= 350,794 * 0.43 / 2000
= 75.42 tons/yr

Potential VOC Emissions (tons/yr) = DENS max production (1000 ft^2/yr) * emission factor (lb/1000 ft^2) / 2000 lb/ton
= 350,794 * 0.35 / 2000
= 61.39 tons/yr

Non-DENS:
Potential PM Emissions are negligible

Potential VOC Emissions (tons/yr) = Non-DENS max production (1000 ft^2/yr) * emission factor (lb/1000 ft^2) / 2000 lb/ton
= 350,794 * 0.19 / 2000
= 33.33 tons/yr

Summary:

	PM (tpy)	VOC(tpy)
DENS	75.42	61.39
Non-DENS	-	33.33
TOTAL	75.42	94.72